

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal Number 1:04M970
)	
HANS GOUW,)	
a.k.a. Liong Hoat Gouw,)	
a.k.a. Hady Gandasaputra,)	
)	
Defendant)	

AFFIDAVIT IN SUPPORT OF TWENTY-THREE CRIMINAL COMPLAINTS,
TWENTY-TWO ARREST WARRANTS, ONE SUMMONS,
AND SEVEN SEARCH WARRANTS

UNDER SEAL UNTIL 1:00 P.M., NOVEMBER 22, 2004

I, Dean McDonald, being duly sworn, state as follows:

I. INTRODUCTION

A. General Introduction

1. I am a special agent with the Bureau of Immigration and Customs Enforcement (hereinafter ICE). ICE is a subordinate component of the Department of Homeland Security (hereinafter DHS) and the successor to many of the law enforcement powers of the former Immigration and Naturalization Service (hereinafter INS). I have been a special agent for two years and am currently assigned to the ICE field office in Arlington, Virginia. Before becoming a special agent, I was an immigration inspector for five years and an INS adjudications officer for six years. My primary duty as an ICE special agent is to investigate violations of the nation's immigration and naturalization laws.

2. I present this affidavit in support of criminal complaints and arrest warrants for Hans Gouw, Isnayanti Gouw, Jenny Gandasaputra, Herman Tanudjaja, Johnson Aliffin, Ratna Hartanto, Brigitta Parera, Willy Irsan, Achnita Supomo, Raymond Marschall, Herlina Suherman, Surya Halim, Danny Susanto, Henry Lee, Albert Warong, Sari Tanudjaya, Johannis Ticoalu, Megawaty Gandasaputra, Michael Wright, Irawan Muljadi, Nany Kumala, and Silvy Karageorge (hereinafter “the targets”). The criminal complaints for Hans Gouw, Isnayanti Gouw, Jenny Gandasaputra, Ratna Hartanto, Brigitta Parera, Willy Irsan, Achnita Supomo, Herlina Suherman, Surya Halim, Megawaty Gandasaputra, and Silvy Karageorge charge each with immigration fraud, in violation of 18 U.S.C. § 1546. The criminal complaints for Johnson Aliffin, Danny Susanto, Henry Lee, and Michael Wright charge each with conspiracy to commit immigration fraud, in violation of 18 U.S.C. §§ 371 and 1546. The criminal complaint for Nany Kumala charges her with identification document fraud, in violation of 18 U.S.C. § 1028. The criminal complaints for Herman Tanudjaja, Raymond Marschall, Albert Warong, Sari Tanudjaya, Johannis Ticoalu, and Irawan Muljadi charge each with conspiracy to commit identification document fraud, also in violation of 18 U.S.C. § 1028.

3. This affidavit is further presented in support of a criminal complaint and summons for Joandi Gani. The complaint for Joandi Gani charges him with immigration fraud, in violation of 18 U.S.C. § 1546. Joandi Gani is also a target of my investigation, as are Rosita Setyawati, Hanny Kembuan, and Lestari Nugroho. These last three individuals have already been indicted by a grand jury in this district for crimes exposed by this investigation, but are discussed in this affidavit to provide necessary context to the complaints, the warrants, and the summons I seek here.

4. This affidavit is further presented in support of an application for warrants to search, and to seize relevant evidence found within, seven properties in the Eastern District of Virginia. The first property is Hans and Isnayanti Gouw's residence and the office of the Chinese Indonesian American Society located at 6155 Pohick Station Drive, Fairfax Station, Virginia. The second property is the office of Asian American Placement Services, located at 6551 Loisdale Court, Suite 115, Springfield, Virginia. The third property is Megawaty Gandasaputra and Michael Wright's residence and the former office of Asian American Placement Services, located at 6003 Captain Marr Court, Fairfax Station, Virginia. The fourth property is Silvy Karageorge's residence and the main office of the Chinese Indonesian Pribumi Community Service, located at 7800 Delano Court, Manassas, Virginia. The fifth property is the residence of Nany Kumala and the office of Kumala Nusantara, located at 6308 Torrence Street, Burke, Virginia. The sixth property is a residence and the former office of both the Chinese Indonesian American Society and Kumala Nusantara, located at 10079 Chestnut Wood Lane, Burke, Virginia. The seventh property is the office of Petra International and the residence of Jenny Gandasaputra and Herman Tanudjaja, located at 5506 Great Tree Court, Fairfax, Virginia. All seven properties are more fully described in attachments A1 through A7.

5. Pursuant to Rule 41 of the Federal Rules of Criminal Procedure, I seek authority to search these seven properties for evidence, fruits, and instruments related to the targets' unlawful activities described in this affidavit, which activities are in violation of 8 U.S.C. §§ 1324 and 1324c; 18 U.S.C. §§ 2, 371, 1001, 1028, 1341, 1542, 1546, and 1956; and 42 U.S.C. § 408. These violations and the basis for each search are more fully

described below. The specific items to be searched for and seized at each location are more fully described in attachments B1 through B7.

6. I have not included every fact I know about the targets of my investigation and their illegal activities in this affidavit. Rather, I have included only those facts I believe are needed to demonstrate probable cause for the complaints, the warrants, and the summons I seek. The information in this affidavit is based on my personal knowledge and observations, on information conveyed to me by other law enforcement officials, and on my review of records, documents and other physical evidence related to the targets' activities.

B. The Chinese Indonesian American Society and Related Targets

The Chinese Indonesian American Society

7. The Chinese Indonesian American Society (hereinafter CIAS) is a cultural society located at 6155 Pohick Station Drive, Fairfax Station, Virginia, the residence of Hans and Isnayanti Gouw. The society ostensibly seeks to help Indonesians immigrate to and remain in the United States. According to Virginia State Corporation Commission records, CIAS was incorporated in Virginia on December 13, 2000, at its present location of 6155 Pohick Station Drive, Fairfax Station, Virginia. At the time of incorporation, the society had two directors: Hans Gouw and his sister, Jenny Gandasaputra. In CIAS's more recent filings with the State Corporation Commission, however, Gouw is listed as the sole officer and director. Prior to September 21, 2000, CIAS was located at 10079 Chestnut Wood Lane, Burke, Virginia, with Gouw acting as the society's secretary general.

8. Since at least September 2000, CIAS has regularly advertised its services in two U.S. magazines that cater to Indonesians living in this country: *Indonesian Journal* (published in Fontana, California) and *Indonesia Media* (published in Glendora, California). According to the advertisements placed in these magazines, CIAS assists its “members” to obtain a broad array of government documents and benefits, including identification cards, driver’s licenses, social security cards, visa extensions, green cards, labor certification, asylum, and U.S. citizenship. In many of the advertisements, interested customers are directed to call specific CIAS representatives, including “Jenny” [Gandasaputra] (the “East Coast representative”), “Gita” [Brigitta Parera], Hanny Kembuan, Lestari Nugroho (the “West Coast representative”), Herlina Suherman (the “Mid West representative”), “Willy” [Irsan], and Raymond Marschall (the “director of membership”).

Hans Gouw

9. Hans Gouw, also known as Liong Hoat Gouw and Hady Gandasaputra, is a 53-year-old Indonesian citizen. Gouw was born in Indonesia on March 12, 1951, but was granted asylum in this country on July 22, 1999. He currently awaits adjustment of his status to that of a lawful permanent resident. Gouw resides at 6155 Pohick Station Drive, Fairfax Station, Virginia, and serves as the principal director of CIAS.

Isnayanti Gouw

10. Isnayanti Gouw, also known as Isnayanti Al Yanti, is a 35-year-old Indonesian citizen and the wife of Hans Gouw. Isnayanti Gouw was born in Indonesia on January 29, 1969, but was granted asylum in this country on July 22, 1999. She currently awaits adjustment of her status to that of a lawful permanent resident. Gouw

resides with her husband, Hans Gouw, at 6155 Pohick Station Drive, Fairfax Station, Virginia, and helps him manage the affairs of CIAS.

Jenny Gandasaputra

11. Jenny Gandasaputra, also known as Sioe Hoa Gouw and Jenny Tanudjaja, is a 51-year-old Indonesian citizen and the sister of Hans Gouw. Gandasaputra was born in Indonesia on February 9, 1953, but was granted asylum in this country on October 27, 1999. She currently awaits adjustment of her status to that of a lawful permanent resident. Gandasaputra is married to Herman Tanudjaja and resides at 5506 Great Tree Court, Fairfax, Virginia. She is the purported East Coast representative of CIAS and the registered corporate agent of a local company, Petra International. Her son, Joandi C. Gani, is the purported director of management at Petra International.

Herman Tanudjaja

12. Herman Tanudjaja is a 59-year-old Indonesian citizen and the husband of Jenny Gandasaputra. Tanudjaja was born in Indonesia on June 4, 1945, but entered the United States on a tourist visa on August 27, 2000. This visa has since expired, and Tanudjaja is currently in deportation proceedings. Tanudjaja resides at 5506 Great Tree Court, Fairfax, Virginia.

Johnson Aliffin

13. Johnson Aliffin is a 33-year-old Indonesian citizen. Aliffin was born in Indonesia on April 15, 1971, but was granted asylum in this country on April 23, 2001. He currently awaits adjustment of his status to that of a lawful permanent resident. Aliffin's address is 8112 Old Oak Drive, Springfield, Virginia. Aliffin is a former employee of CIAS who frequently handled individual client cases.

Ratna Hartanto

14. Ratna Sari Hartanto, also known as Ai “Laura” Ling, is a 38-year-old Indonesian citizen. Hartanto was born in Indonesia on June 17, 1966, but was granted asylum in this country on May 29, 2001. She currently awaits adjustment of her status to that of a lawful permanent resident. Hartanto’s last known address was 6465 Rockshire Street, Alexandria, Virginia. Hartanto is a former employee of CIAS who frequently handled individual client cases.

Rosita Setyawati

15. Rosita Setyawati, also known as “Budi,” is a 46-year-old Indonesian citizen. Setyawati was born in Indonesia on March 8, 1958, but came to the United States on January 26, 2001, on a tourist visa. On August 1, 2001, she filed an asylum application which she later withdrew when the government questioned its legitimacy. On October 14, 2004, Setyawati was ordered deported, and she is now the subject of an outstanding order of deportation. Setyawati speaks Indonesian and English, and resides at 2010 Bucknell Street, Philadelphia, Pennsylvania. Setyawati is an associate of Gouw’s who refers Indonesian clients from Philadelphia to CIAS in Virginia. On November 10, 2004, Setyawati was indicted by a grand jury sitting in this district on one count of asylum fraud, in violation of 18 U.S.C. § 1546. Her arrest awaits the Court’s review and approval of the complaints and searches I seek here.

Brigitta M. Parera

16. Brigitta Mercy Parera, also known as “Gita,” Brigitta Mercy Laibahas, Maria Yohana, and Yoh Mei En, is a 35-year-old Indonesian citizen. Parera generally gives her date of birth as July 20, 1969; but when she assumes the alias of Maria Yohana, she gives

her date of birth as July 20, 1965. According to immigration records, Parera last entered the country as Brigitta Parera on November 18, 2001, on a tourist visa. On November 14, 2002, however, Parera was granted asylum under the name Maria Yohana and now awaits adjustment of her status to that of a lawful permanent resident under that name. I know that Parera and Yohana are in fact the same person because I have compared Parera's DMV photograph, Yohana's DMV photograph, and Yohana's asylum application photograph and determined that they depict the same person. In addition, I have spoken to a knowledgeable witness who confirmed that Parera and Yohana are one. Parera speaks Indonesian and English, and resides at 8102 Harte Place, Apartment 104, Vienna, Virginia. Parera is a secretary and translator for CIAS.

Willy Irsan

17. Willy Irsan is a 33-year-old Indonesian citizen. Irsan was born in Indonesia on September 19, 1971, and entered the United States on July 28, 2000, on a tourist visa. On May 16, 2003, an immigration judge denied Irsan's application for asylum, and Irsan is now the subject of an outstanding deportation order. Irsan resides at 14426 Awbrey Patent Drive, Centreville, Virginia. Irsan is a known translator for CIAS.

Achnita Supomo

18. Achnita Supomo is a 37-year-old Indonesian citizen and the wife of Willy Irsan. Supomo was born in Indonesia on May 3, 1967, and last entered the United States on July 1, 2000, on a tourist visa. This tourist visa has expired, and Supomo is now the subject of an outstanding deportation order. Supomo resides at 14426 Awbrey Patent Drive, Centreville, Virginia. Supomo is a known translator for CIAS.

Lestari Nugroho

19. Lestari Nugroho is a 27-year-old Indonesian citizen. Nugroho was born in Indonesia on October 23, 1976, but was granted asylum in this country on March 5, 2002. She currently awaits adjustment of her status to that of a lawful permanent resident. Nugroho speaks Indonesian and English, and resides at 12582 N.W. Millford Street, Portland, Oregon. Nugroho is CIAS's West Coast representative. On November 10, 2004, Nugroho was indicted by a grand jury sitting in this district on one count of asylum fraud, in violation of 18 U.S.C. § 1546. Her arrest awaits the Court's review and approval of the complaints and searches I seek here.

Raymond Marschall

20. Raymond Marschall is a 26-year-old Indonesian citizen. Marschall was born in Indonesia on March 7, 1977, and entered the United States on August 27, 2000, on a tourist visa. This visa has expired, and Marschall currently has an outstanding order of deportation. Marschall's last known address was 5506 Great Tree Court, Fairfax, Virginia. At one time, Marschall was CIAS's director of membership.

Hanny Kembuan

21. Hanny Kembuan is a 46-year-old Indonesian citizen. Kembuan was born in Indonesia on November 11, 1958, but was granted lawful permanent residence in this country on January 19, 1995. Until approximately March or April of this year, Kembuan was a CIAS representative and lived in Virginia. Indeed, his current Virginia driver's license gives his address as 6155 Pohick Station Drive, Fairfax Station, Virginia. In April, Kembuan traveled to Indonesia, but returned to the United States on September 19, 2004, through Los Angeles, California. At the airport, Kembuan declared to customs

officials that his address was 1412 Orange Grove Avenue, Apartment B, Glendale, California, and I believe he is now residing somewhere in California. On November 10, 2004, Kembuan was indicted by a grand jury sitting in this district on one count of asylum fraud, in violation of 18 U.S.C. § 1546. His arrest awaits the Court's review and approval of the complaints and searches I seek here.

Herlina Suherman

22. Herlina Suherman is a 28-year-old Indonesian citizen. Suherman was born in Indonesia on October 7, 1976, but was granted asylum in this country on September 5, 2002. She currently awaits adjustment of her status to that of a lawful permanent resident. Suherman's last known address was 2650 Marfitt Road, Apartment 18, East Lansing, Michigan, but she may now be in Indonesia. At least until very recently, Suherman was CIAS's Mid West representative.

Surya Halim

23. Surya Darma Halim is a 33-year-old Indonesian citizen. Halim was born in Indonesia on April 11, 1972, but was granted asylum in this country on June 28, 2002. He currently awaits adjustment of his status to that of a lawful permanent resident. Halim speaks Indonesian and English, and resides at 14426 Awbrey Patent Drive, Centreville, Virginia. Halim is an interpreter for CIAS.

Danny Susanto

24. Danny Susanto is a 34-year-old Indonesian citizen. Susanto was born in Indonesia on September 26, 1970, but was granted asylum in this country on February 9, 2004. He currently awaits adjustment of his status to that of a lawful permanent resident.

Susanto's last known address was 6155 Pohick Station Drive, Fairfax Station, Virginia. Susanto is a former CIAS employee who prepared asylum applications for clients.

Henry Lee

25. Henry Lee is a 29-year-old Australian national of Indonesian ancestry. Lee was born on June 26, 1975. Lee's last known entry into the United States was September 28, 2001, as a tourist. His current whereabouts are unknown. Lee is a former CIAS employee who prepared asylum applications for clients.

Albert Warong

26. Albert Emile Warong is a 74-year-old Indonesian citizen. Warong was born in Indonesia on October 28, 1929, but has been a lawful permanent resident in this country since approximately the early 1980s. Warong speaks Indonesian and English, and resides at 27 School Drive, #102, Gaithersburg, Maryland. Warong is a suspected associate of Hans Gouw.

Sari Tanudjaya

27. Sari Djuwitawaty Tanudjaya, also known as Sari Djuwitawaty Tanudjaja, is a 48-year-old Indonesian citizen. Tanudjaya was born in Indonesia on March 18, 1956, but was granted asylum in this country on May 4, 2001. She currently awaits adjustment of her status to that of a lawful permanent resident. Tanudjaya's address is 27 School Drive, #102, Gaithersburg, Maryland. Tanudjaya is a known associate of Albert Warong.

Johannis Ticoalu

28. Johannis Ticoalu is a 57-year-old Indonesian citizen. Ticoalu was born in Indonesia on April 21, 1947, but became a lawful permanent resident in this country on

February 6, 1997. Ticoalu lives at 6369 Silver Ridge Circle, Alexandria, Virginia, and serves as a pastor at a local church. Ticoalu is a suspected associate of Albert Warong.

C. Asian American Placement Services and Related Targets

Asian American Placement Services

29. Asian American Placement Services (hereinafter AAPS) is a business located at 6551 Loisdale Court, Suite 115, Springfield, Virginia. From approximately July 2001 to June 2003, AAPS was located at 6003 Captain Marr Court, Fairfax Station, Virginia, the residence of Megawaty Gandasaputra and Michael Wright. Prior to that, the business was located at 4904 King Richard Drive, Annandale, Virginia. AAPS appears to be owned and operated by Megawaty Gandasaputra and Michael Wright, and is primarily dedicated to the provision of immigration services to Indonesian and Chinese immigrants. There is no record of AAPS's incorporation at the State Corporation Commission.

30. Since at least August 2001, AAPS has regularly advertised its services in the magazines *Indonesian Journal* and *Indonesia Media*. According to the advertisements placed in these magazines, AAPS provides a broad array of immigration services to its clients, including asylum, green cards, work authorization, social security cards, driver's licenses, labor certification, U.S. visas, and Canadian immigration benefits. In all of the advertisements, interested customers are directed to call specific AAPS agents, including "Mega G. Saputra" [Megawaty Gandasaputra] and Michael Wright.

Megawaty Gandasaputra

31. Megawaty Gandasaputra, also known as Mega G. Saputra and Sioe Mey Gouw, is a 46-year-old Indonesian citizen and the sister of Hans Gouw and Jenny

Gandasaputra. Megawaty Gandasaputra was born in Indonesia on July 1, 1959, but was granted asylum in this country on July 20, 1999. She currently awaits adjustment of her status to that of a lawful permanent resident. Gandasaputra speaks Indonesian and English, and resides with her husband, Michael Wright, at 6003 Captain Marr Court, Fairfax Station, Virginia. Gandasaputra's marriage to Wright is her second. She married Wright on July 24, 2003, in Fairfax County. Before that, she was married to Irawan Muljadi. Gandasaputra is believed to own and operate AAPS.

Michael Wright

32. Michael Wright is a 43-year-old United States citizen and the husband of Megawaty Gandasaputra. Wright resides with his wife, Megawaty Gandasaputra, at 6003 Captain Marr Court, Fairfax Station, Virginia. He is believed to own and operate AAPS with Gandasaputra.

Irawan Muljadi

33. Irawan Muljadi is a 55-year-old Indonesian citizen. Muljadi was born in Indonesia on June 29, 1949, but was granted asylum in this country on March 31, 2001. Muljadi's last known address was 10807 Oak Wilds Court, Burke, Virginia, but he may now live in Indonesia. Muljadi is Megawaty Gandasaputra's ex-husband.

D. Kumala Nusantara and Related Targets

Kumala Nusantara

34. Kumala Nusantara (hereinafter KN), also known as K-Nusantara Service, Inc., is a business located at 6308 Torrence Street, Burke, Virginia, the present residence of Nany Kumala. From approximately August 2002 to August 2003, KN was located at 10079 Chestnut Wood Lane, Burke, Virginia, Kumala's former residence. (CIAS was

also located in this same residence in the year 2000.) KN is owned and operated by Nany Kumala and is primarily dedicated to the provision of immigration services to Indonesian immigrants. According to State Corporation Commission records, KN was incorporated in Virginia on August 6, 2002. The articles of incorporation state that Kumala is the corporation's director and that the corporation's official address is 6155 Pohick Station Drive, Fairfax Station, Virginia (the actual address of CIAS). The articles further state that Kumala's address is 10079 Chestnut Wood Lane, Burke, Virginia.

35. On at least one occasion, KN has advertised its services in the magazine *Indonesian Journal*. According to the advertisement, KN provides a broad array of immigration services to its clients, including identification cards, driver's licenses, work permits, social security cards, and asylum. In the advertisement, interested customers are directed to call "Nany" [Kumala].

Nany Kumala

36. Nany Lucia Kumala, also known as Kiok Nio Gouw and Nany Kumala Sari, is a 49-year-old Indonesian citizen and suspected cousin of Hans Gouw. Kumala was born in Indonesia on December 7, 1954, but was granted asylum in this country on December 12, 2000. She currently awaits adjustment of her status to that of a lawful permanent resident. Kumala speaks Indonesian and English, and resides at 6308 Torrence Street, Burke, Virginia. During most of the year 2000, Kumala worked for Hans Gouw at CIAS, but left in November. Kumala is now the owner and operator of KN.

E. Chinese Indonesian Pribumi Community Service and Related Targets

Chinese Indonesian Pribumi Community Service

37. Chinese Indonesian Pribumi Community Service (hereinafter CIPCS), also known as Indonesian Community Service, is a business located at 7800 Delano Court, Manassas, Virginia, the home of Silvy Karageorge. CIPCS is affiliated with a law firm located in Falls Church, Virginia. Prior to August 2002, CIPCS was located at 6405 King Louis Drive, Karageorge's prior residence. CIPCS appears to be owned and operated by Karageorge and is primarily dedicated to the provision of immigration services to Indonesian immigrants. There is no record of CIPCS's incorporation at the State Corporation Commission.

38. Since at last October 2000, CIPCS has regularly advertised its services in the magazine *Indonesian Journal*. According to the advertisements placed in this magazine, CIPCS provides a broad array of immigration services to its clients, including asylum, driver's licenses, social security cards, visa extensions, green cards, U.S. citizenship, and Canadian immigration benefits. In most of the advertisements, interested customers are directed to call "Silvy" [Karageorge].

Silvy Karageorge

39. Silvy Karageorge, also known as Silvy Walujo, Silvy Rodriguez, and Silvy Tjandratanaaja, is a 47-year-old United States citizen. Karageorge was born in Indonesia on December 29, 1956, but naturalized on January 30, 1998. Karageorge speaks Indonesian and English, and resides at 7800 Delano Court, Manassas, Virginia. Karageorge appears to be the owner and operator of CIPCS.

F. Petra International and Related Targets

Petra International

40. Petra International (hereinafter PI) is a business located at 5506 Great Tree Court, Fairfax, Virginia, the residence of Jenny Gandasaputra and Herman Tanudjaja. The business is purportedly engaged in the importation and exportation of goods from the United States, although there are no signs of this at 5506 Great Tree Court. According to the records of the State Corporation Commission, Gandasaputra incorporated PI in Virginia on September 17, 1998, and serves as the corporation's registered agent. On the certificate of incorporation, PI's address is listed as 10702 Oakenshaw Court, Burke, Virginia, but the company's mail and recent government filings all reflect the current address of 5506 Great Tree Court, Fairfax, Virginia. PI's 1998 incorporation lapsed on January 31, 2000, when PI failed to pay its 1999 corporation fee. Gandasaputra has not renewed PI's incorporation. According to applications PI filed with the Department of Labor, Joandi C. Gani, Gandasaputra's 19-year-old son, is PI's director of management.

41. Fairfax County records show that from July 1999 to March 13, 2003, Gandasaputra owned 5506 Great Tree Court, the residential property where PI is located. On March 13, 2003, she sold it to Isnayanti Gouw for \$338,000. On December 22, 2003, Gouw deeded the property back to Gandasaputra as gift. On June 4, 2004, Gandasaputra re-sold the property to Willy Irsan, a CIAS employee, for \$403,000. On August 31, 2004, Irsan in turn deeded the property to Hans Gouw, again as a gift. Despite these many transfers of title, I know that Gandasaputra continues to live at 5506 Great Tree Court to this day. An agent assisting me has seen Gandasaputra's personal car outside the residence on several occasions in the past few months, and this same agent has

determined that Gandasaputra and PI continue to receive a steady stream of mail at the address.

Joandi C. Gani

42. Joandi Chihtra Gani is a 19-year-old Indonesian citizen and the son of Jenny Gandasaputra. Gani was born in Holland on January 3, 1985, but was granted asylum in this country on October 27, 1999. He currently awaits adjustment of his status to that of a lawful permanent resident. Gani is a student at Pennsylvania State University and lives at 478 East Beaver Avenue in State College, Pennsylvania, during the school year. According to school records, his permanent address is 5506 Great Tree Court, Fairfax, Virginia. He is also the purported director of management for Petra International.

G. Cooperating Witnesses and a Summary of the Relevant Criminal Law

Confidential Informants and Witnesses

43. As part of my investigation, I have enlisted the aid of Indonesian immigrants as confidential informants or witnesses. All of these confidential informants and witnesses are actual Indonesian citizens who have no lawful immigration status in the United States. These confidential informants and witnesses have assisted me in two ways. First, several have informed me of past dealings they have had with certain of the targets to obtain fraudulent immigration benefits. Second, many of the confidential informants have recently approached certain targets at my direction and have obtained fraudulent immigration benefits from these same targets under controlled and clearly unlawful circumstances.

44. I have found the confidential informants and witnesses to be credible and reliable. I say this because my colleagues and I have been able to corroborate their statements and actions through personal observation or by reference to independent sources.

Furthermore, none of the confidential informants or witnesses has a criminal record to my knowledge. For purposes of this affidavit, I will refer to an individual confidential informant or witnesses by the initials CI or CW followed by a number, for example CI-2, CI-6, CW-4, etc.

The Relevant Criminal Law

45. I have determined that the targets have each conspired to commit or have actually committed one or more of the following crimes:

- a) 8 U.S.C. § 1324(a)(1) (encouraging illegal immigration);
- b) 8 U.S.C. § 1324c(e) (failure to disclose role in preparation of a false immigration application);
- c) 18 U.S.C. § 371 (conspiracy);
- d) 18 U.S.C. § 1001(a) (making false statements);
- e) 18 U.S.C. § 1028(a) (identification document fraud);
- f) 18 U.S.C. § 1341 (mail fraud);
- g) 18 U.S.C. § 1542 (passport fraud);
- h) 18 U.S.C. § 1546(a) (immigration fraud);
- i) 18 U.S.C. § 1956(a) (money laundering); and
- j) 42 U.S.C. § 408(a) (social security fraud).

46. I am advised that 8 U.S.C. § 1324(a)(1) makes it a crime to encourage or induce, for the purpose of commercial advantage and private financial gain, an alien to come to, enter, or reside in the United States, knowing or in reckless disregard of the fact that such coming to, entry, or residence is or will be in violation of law. For purposes of this affidavit, I note that providing immigration benefits by fraud to aliens unlawfully in the country encourages their continued illegal residence (United States v. Oloyede, 982 F.2d 133, 137 (4th Cir. 1993)). I am further advised that 8 U.S.C. § 1324c(e) makes it a crime for a person knowingly and willfully to fail to disclose, to conceal, or to cover up the fact that he or she has prepared or assisted in preparing any falsely made application for an immigration benefit

within the jurisdiction of the Department of Homeland Security on behalf of another person when such preparation and assistance was provided for a fee or other remuneration.

47. I am advised that 18 U.S.C. § 1001(a)(2) makes it a crime to knowingly make any materially false, fictitious, or fraudulent statement or representation in any matter within the jurisdiction of the executive branch of the United States government. For purposes of this affidavit, I note that the Departments of Homeland Security, Justice, Labor, and State are departments within the executive branch of the United States. I am further advised that pursuant to 18 U.S.C. §§ 2(b) and 1028 (a)(1) it is a violation of federal law to “knowingly and without lawful authority produce[] an identification document” (including a state driver’s license), or to cause another to do the same, if such production would be in or affect interstate or foreign commerce. I am also advised that 18 U.S.C. § 1341 makes it a crime for any person to use the mail or offices of the Postal Service to execute any scheme or artifice to defraud.

48. I am also advised that 18 U.S.C. § 1542 makes it a crime to furnish a passport to another person for that person’s use when such passport was issued by way of a false statement. I am further advised that 18 U.S.C. § 1546(a) makes it a crime to use, attempt to use, or possess any visa or other document (such as a passport) prescribed by statute or regulation for entry into the United States, knowing the visa or document to be forged, counterfeited, falsely made, procured by means of any false statement, or otherwise procured by fraud or unlawfully obtained. I am further advised that 18 U.S.C. § 1546(a) also makes it a crime to knowingly subscribe as true, under penalty of perjury, a false statement with respect to a material fact in an application or document required by the immigration laws and

federal regulations prescribed thereunder, or to knowingly present such an application or document containing false statements.

49. I am also advised that pursuant to 18 U.S.C. § 1956(a), “whoever, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts . . . such a financial transaction which in fact involves the proceeds of specified unlawful activity . . . with the intent to promote the carrying of specified unlawful activity” . . . is guilty of a crime. For purposes of this affidavit, I know that the term “specified unlawful activity” includes violations of 8 U.S.C. § 1324 and 18 U.S.C. §§ 1028, 1341, 1542, and 1546.

50. I am advised that 42 U.S.C. § 408(a)(7)(A) makes it a crime for any person “willfully, knowingly, and with intent to deceive, [to use] a social security account number, assigned by the Commissioner of Social Security (in the exercise of the Commissioner's authority under [42 U.S.C. § 405(c)(2)] to establish and maintain records) on the basis of false information furnished to the Commissioner of Social Security by [that person] or by any other person” with “the purpose of obtaining anything of value from any person, or for any other purpose.” I am further advised that 42 U.S.C. § 408(a)(7)(B) makes it a crime for anyone “to falsely represent[] a number to be the social security account number assigned by the Commissioner of Social Security to him or to another person, when in fact such number is not the social security account number assigned by the Commissioner of Social Security to him or to such other person” with the intent to deceive and with “the purpose of obtaining anything of value from any person, or for any other purpose.”

51. I am also advised that 18 U.S.C. § 371 makes it a crime for two or more persons to conspire to commit an offense against the United States, provided one or more of such

persons do any act to effect the object of the conspiracy. Similarly, 18 U.S.C. § 2 provides that any person who aids, abets, counsels, commands, induces, or procures the commission of a federal offense shall be punishable as a principal.

52. I am also advised that Federal Rule of Criminal Procedure 41 permits a United States Magistrate Judge to issue a warrant authorizing a federal law enforcement officer to search for and seize evidence, fruits, and instruments of a particular crime. Such a warrant is generally issued upon the written application and affidavit of a federal law enforcement officer.

II. SUMMARY OF THE INVESTIGATION

53. This case is the result of a nearly two-year investigation by a task force of federal and state law enforcement agencies. The participating agencies include ICE, the Fairfax County Police Department, the Diplomatic Security Service (Department of State), the Department of Labor, the Internal Revenue Service (Department of Treasury), the Social Security Administration, the Virginia Department of Motor Vehicles, the United States Postal Inspection Service, the Secret Service (Department of Homeland Security), and the Federal Bureau of Investigation (Department of Justice). The task force has received important assistance from several other agencies including the Office of Refugee, Asylum, and International Operations within Citizenship and Immigration Services (Department of Homeland Security); the Executive Office for Immigration Review (Department of Justice); the Virginia Employment Commission; and the Employment and Training Administration (Department of Labor).

54. As outlined below, my investigation has revealed that the targets identified in this affidavit have defrauded the United States and the Commonwealth of Virginia on a

grand scale from at least 1999 to the present. In particular, the individuals I seek to arrest have prepared and submitted fraudulent applications for a wide variety of government benefits, primarily for sale to illegal immigrants living throughout the United States. The benefits at issue include asylum in the United States, alien labor certification, United States passports, Virginia driver's licenses, Virginia identification cards, social security cards, and social security account numbers. In addition, some of the targets have engaged in money laundering.

55. The fraud committed by the targets in this case was unusual in its size and scope. For example, I conservatively estimate that the targets collectively aided over 1,000 immigrants to file for asylum by fraud; about 170 immigrants to file for alien labor certification by fraud; and nearly 1,900 immigrants to obtain Virginia driver's licenses and identification cards by fraud. Similarly, the fraud involved targets, immigrants, and addresses in states across the country, including Washington, Oregon, Montana, California, Hawaii, Colorado, Michigan, Illinois, Texas, Alabama, Florida, Georgia, Tennessee, Virginia, Maryland, Ohio, Pennsylvania, New Jersey, Connecticut, and New York.

III. ASYLUM FRAUD

A. Introduction

The Asylum Process

56. Under certain circumstances, the United States provides asylum to aliens fleeing persecution in their home country. To qualify for asylum, an alien must prove that he has a well-founded fear of persecution in his home country on account of his race, religion, nationality, membership in a particular social group, or political opinion. *See* 8 U.S.C. § 1101(a)(42); 8 C.F.R. § 1208.13. The alien must also prove that his government

is the persecutor or that his government is unable or unwilling to control the persecutor.
Id.

57. As a general rule, an alien present in the United States may apply for asylum in one of two ways: affirmatively or defensively. An affirmative asylum claim is one made at the initiative of the alien before the alien is apprehended or placed in removal proceedings. A defensive claim is one made by the alien only upon the alien's apprehension or placement in removal proceedings. In either instance, the alien makes the claim by filing an Application for Asylum and for Withholding of Removal, formally known as a form I-589. Affirmative claims are generally filed by mail at the nearest service center of Citizenship and Immigration Services (CIS), a bureau within DHS. For asylum applicants living in Virginia the relevant CIS service center is in Texas. Defensive claims are typically filed before and heard by an immigration judge, an administrative judge within the Executive Office for Immigration Review of the Department of Justice.

58. When an alien files an affirmative asylum application at a service center, the service center refers the application for adjudication to a regional office of the Asylum Division of the Office of Refugee, Asylum, and International Operations within CIS. The regional offices of the Asylum Division are commonly referred to as asylum offices, and I shall use that name here for the purpose of brevity. The regional asylum office with jurisdiction to adjudicate the affirmative asylum claims of aliens living in Virginia is located in Arlington, Virginia.

59. When jurisdiction over an asylum application rests with an asylum office, an asylum officer interviews the applicant in a non-adversarial manner to elicit all

information about the applicant's alleged fear of persecution. *See* 8 C.F.R. § 1208.9. During the asylum interview, the applicant may have the assistance of an attorney or non-attorney representative, present witnesses, and submit evidence. The applicant is required to provide complete information about his identity, date and place of birth, and nationality. *See* 8 C.F.R. § 1208.9(b). The asylum officer is authorized to administer oaths and to verify the identity of the applicant and the interpreter, if any. *See* 8 C.F.R. § 1208.9(c). If the applicant is not sufficiently versed in English, the applicant must provide a competent interpreter fluent in English and the applicant's preferred language. *See* 8 C.F.R. § 1208.9(g). The applicant is not permitted to use his attorney, a non-attorney representative, or a witness as an interpreter. *See* 8 C.F.R. § 1208.9(g).

60. An asylum applicant and anyone who assists the applicant to prepare the application (other than the applicant's spouse or children) must sign the application under the penalty of perjury. *See* 8 C.F.R. § 1208.3(c)(2). Any preparer who is required to sign an asylum application must also provide his or her full mailing address. *See* 8 C.F.R. § 1208.3(c)(2). An individual who knowingly places false information on an asylum application faces criminal and civil penalties. *See* 18 U.S.C. § 1001; 8 C.F.R. § 1208.3(c)(4).

61. With certain time restrictions and other limitations, an asylum applicant may apply for employment authorization that allows the applicant to work lawfully while in the United States. *See* 8 C.F.R. § 1208.7. If an alien's application for asylum is approved, the alien and any immediate family members included in the alien's application are classified as "asylees." An asylee's status is indefinite, unless terminated for a particular reason. *See* 8 C.F.R. §§ 1208.14(e), 1208.22, 1208.24. An asylee may

file for lawful permanent residence at any time more than one year after his or her asylum application is granted. *See* 8 C.F.R. § 1209.2. Lawful permanent residents may eventually apply for United States citizenship.

Summary of Findings

62. My investigation has shown that Hans Gouw, Isnayanti Gouw, Jenny Gandasaputra, Johnson Aliffin, Ratna Hartanto, Rosita Setyawati, Brigitta Parera, Willy Irsan, Achnita Supomo, Lestari Nugroho, Hanny Kembuan, Herlina Suherman, Surya Halim, Danny Susanto, Henry Lee, Megawaty Gandasaputra, Nany Kumala, and Silvy Karageorge have prepared, submitted, or sold fraudulent applications for asylum in the United States. Specifically, my investigation has shown that from 1999 continuing through the present these targets have systematically defrauded the Departments of Homeland Security and Justice by assisting Indonesian immigrants to craft and submit false asylum applications to both asylum officers and immigration judges. In return for their assistance, the targets charge each immigrant a fee of between \$2,000 and \$4,000.

B. Evidence of Fraud Based on Asylum Applications Recently Filed by the Targets

63. Based on my investigation, I believe the targets have collectively filed at fraudulent applications for asylum on behalf of over 1000 immigrants. Because the targets often concealed their role in preparing these applications, it has been difficult to identify each and every application prepared by a specific target. I have been able, however, to secure and review approximately 380 applications linked to a specific target because that target's name and signature appeared in the preparer section on the application or because the applicant's home address on the application was in fact an address controlled by a specific target.

64. To date, my colleagues and my review of the approximately 380 known applications has revealed that the vast majority of the applications are facially suspect. This, in turn, has led me to believe that few if any of the applications the targets have filed in the past five years are legitimate. For example, nearly all of the 380 applications reviewed include either false applicant addresses or boilerplate language in the applicant's asylum declaration. The boilerplate language is particularly common and appears, in varying form, in nearly every application. Indeed, my initial review suggests that the above named targets are using stock language to create the asylum declarations in each application.

65. As a general rule, the stock language in the declarations includes (1) formulaic presentations of the applicant's background, (2) formulaic recitations of the historical treatment of Christians of Chinese ancestry in Indonesia, and (3) boilerplate stories of persecution in Indonesia. These boilerplate stories generally describe several instances of persecution suffered by the applicant, such as sexual assault, physical assault, robbery, and mob attacks on Chinese businesses and Christian worship services. In some applications, the same instance or instances of persecution are presented verbatim. In others, strands of a previously used instance of persecution are combined with new or altered material to create a variation of the original theme.

Summary of Evidence Against Certain Targets

66. In light of the large number of applications the targets have prepared since 1999 and the fact that these applications share so much common boilerplate, I will not present an analysis in this affidavit of each and every asylum application I know or suspect the targets to have prepared. Rather, I will offer several examples of some of the

boilerplate claims my colleagues and I have come across in order to illustrate for the Court the nature of the fraud uncovered. These illustrations demonstrate how different targets were repeating the same false allegations of persecution on behalf of different and unrelated immigrant applicants, all in attempt to obtain asylum by fraud.

Claims of Sexual Assault by a Taxi Driver

67. Between October 31, 2000, and January 16, 2002, eight female Indonesian immigrants filed applications for asylum in which the applicant claimed that she had been raped by a male taxi driver on account of the applicant's Chinese ancestry. The following chart summarizes for each application (1) the date of filing, (2) the name of the preparer, (3) the address of the preparer, (4) the applicant's claimed state of residence, and (5) the location of the asylum office charged with adjudicating the application.

<i>Date of Filing</i>	<i>Name of Preparer</i>	<i>Address of Preparer</i>	<i>Applicant's Original State of Residence</i>	<i>Asylum Office</i>
10/31/00	Hans Gouw	6155 Pohick Station Drive, Fairfax Station, VA	Virginia	Arlington
12/29/00	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
2/01/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
2/06/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
4/12/01	Johnson Aliffin	6155 Pohick Station Drive, Fairfax Station, VA	Arizona	Los Angeles
4/26/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Pennsylvania	Newark
5/25/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Texas	Houston
1/16/02	No listed preparer	N/A	Virginia	Arlington

68. The claim of rape in each application is essentially identical except for the date and location of the rape. With minor variation in spelling, tense, and vocabulary, the following is the basic statement found in all eight applications:

I missed the bus and decided to take a taxi. I told the driver where to go and got into the car. On the way, I noticed that he was driving to the wrong direction. The taxi was heading to the suburb of Jakarta. When I asked the driver where he

was going to take me, he did not answer at all. I sensed that something was going wrong. I quietly tried to open the door, but to my shock, the door could not be opened from inside. I was so scared to death, because I had heard that many Chinese girls were brutally raped recently. Finally, I begged the driver to stop the taxi, but he was just laughing. I tried to open the window but I couldn't find the handle. I screamed for help as loud as I could but who could hear me in the middle of nowhere? I just prayed and prayed loudly, "God, please help me" hoping he would change his mind and not to rape or attack me. Suddenly he stopped the taxi, opened the passenger door, and sat next to me. He had a knife in his hand. I was begging him not to hurt me and asked him to let me go. I offered him to take everything he wanted from me. He grabbed my purse, took all the money I had and then he pulled me out of the car. I looked around and realized that I was on a farm side and we were all alone by ourselves. I screamed for help but he slapped me. He then pushed me and I fell down. Because I was wearing a skirt, when I fell down my skirt was pulled up and my panties could be seen clearly. Obviously, he saw that too, and it aroused his evil desire. He jumped on top of me, sat on my belly, and suddenly started kissing my face my lips, and my neck. His kiss was going down and suddenly he tore my blouse and undid my bra. He then continued kissing my body. I was helpless and started crying and he seemed to enjoy it. My blouse was ripped off and he was trying to pull my pants, and I fought off, while begging to let me go. He pulled out his trousers, grabbed my hair, and pushed my head to his private. He then forced me to do further. I tried very hard not to do it. He pulled my hair even harder and yelled at me to do what he asked or he would kill me. He slapped my face many times and then I couldn't bear it anymore and did what he asked me to do. It was very disgusting. When he was already satisfied, he stood up, and went back to his car and left as if nothing happened. I was crying and threw up. After I felt strong enough, I walked and walked to find help. I was half naked and my body face was swollen. At last, after walking for almost an hour, I found a house and got helped. The owner of the house, the old couple took me home. The next day, my husband took me to the police station and reported the incident. After being asked about the incidents, they said that they would investigate it and asked me to go home and they would inform me if they found the taxi driver. Until now, I heard nothing from the police about the incidents.

69. Between December 1, 1999, and July 21, 2003, six female Indonesian immigrants filed applications for asylum that contained a very similar account of a rape by a taxi driver. The following chart summarizes for each application (1) the date of filing, (2) the name of the preparer, (3) the address of the preparer, (4) the applicant's

claimed state of residence, and (5) the location of the asylum office charged with adjudicating the application.

<i>Date of Filing</i>	<i>Name of Preparer</i>	<i>Address of Preparer</i>	<i>Applicant's Original State of Residence</i>	<i>Asylum Office</i>
12/1/99	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
5/3/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Virginia	Arlington
5/8/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Georgia	Arlington
7/12/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Pennsylvania	Newark
8/10/01	No listed preparer	N/A	Virginia	Arlington
7/21/03	No listed preparer	N/A	Kentucky; but later changed to Virginia	Chicago

70. Like the eight applications described in paragraphs 67 and 68 above, one of the core allegations of persecution in these six applications is that the applicant was raped by a male taxi driver on account of the applicant's Chinese ancestry. Indeed, the initial account of the rape in these applications is virtually identical to the eight described above; only the endings are different. In the application prepared by Gouw the taxi driver does not complete the rape, but rather robs the applicant and throws her out of the taxi. In the first application prepared by Lee, the rape ends with the applicant biting her attacker which allows her to flee. In the second, the rape is interrupted when four motorcycles approach the scene of the rape, allowing the applicant to run away. In the application prepared by Susanto, the rape is not completed because the applicant is taken into a house and her attacker is frightened by an approaching car. In one of the applications with no listed preparer, the rape is interrupted when the applicant kicks her assailant and a car approaches. In the other, the rape is interrupted when the applicant kicks her assailant and is able to drive away in the taxi.

71. Immigration records show that this stock account of a rape by a taxi driver was a highly effective fraud. Of the fourteen applications just described, eleven were granted: six by an asylum officer and five by an immigration judge upon further review. Of the remaining three, an immigration judge denied one, and the other two await final adjudication.

Sexual Assaults by Native Indonesians While the Asylum Applicant Was Jogging

72. Between March 1, 2001, and October 5, 2001, ten female Indonesian immigrants filed applications for asylum that claimed that the applicant had been sexually assaulted at knife point by two native Indonesian men while jogging. The following chart summarizes for each application (1) the date of filing, (2) the name of the preparer, (3) the address of the preparer, (4) the applicant's claimed state of residence, and (5) the location of the asylum office charged with adjudicating the application.

<i>Date of Filing</i>	<i>Name of Preparer</i>	<i>Address of Preparer</i>	<i>Applicant's Original State of Residence</i>	<i>Asylum Office</i>
3/01/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
3/22/01	Hans Gouw	6155 Pohick Station Drive, Fairfax Station, VA	Virginia	Arlington
4/12/01	Johnson Aliffin	6155 Pohick Station Drive, Fairfax Station, VA	Arizona	Los Angeles
5/02/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	New York	New York
5/16/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Washington, but later changed to Virginia	Arlington
5/22/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Georgia	Arlington
5/31/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Pennsylvania	Newark
6/21/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Pennsylvania	Newark
8/02/01	No listed preparer	N/A	Iowa, but later changed to Virginia	Chicago
10/05/01	No listed preparer	N/A	Washington, but later changed to Virginia	Arlington

73. The claim of sexual assault in each application is essentially identical except for the date and location of the sexual assault. With minor variation in spelling, tense, and vocabulary, the following is the statement found in all ten applications:

One of my activities that I enjoyed the most during my leisure time was jogging. I liked jogging in the morning because I could still breathe fresh air. In the afternoon, the weather was very humid and stuffy since the air pollution had always become a problem in Indonesia. That morning on [date], as usual I went jogging. It was around nine o'clock in the morning. I usually jogged between the park and my house. It was approximately 5 or 6 blocks away from home. That day, 1 block before I reaching home, I didn't know that 2 native guys were following me, and one of them grasped me from the back. I was shocked because one of them put a knife towards my neck. He told me to keep my mouth shut and not to scream because they had no hesitate to finish my live at that time. They ordered me to sit down. As I sat down on the bench in the middle of them, one of them tried to kiss me and molest me. His hand was touching my breast while the other was putting a knife onto my neck. I was muttered and scared. I was crying and begging them for mercy and for letting me go. At that time, I noticed native people passed by back and forth and watched me almost being raped and didn't help me at all. They were laughing and starting to make fun of me. They also said that I was beautiful and sexy. One of them tried to rip off my T-shirt. I was so scared, embarrassed, and humiliated on that moment. The other guy seemed to enjoy the scene and encouraged him to rape me. As he began to take off my underwear, I couldn't stand it anymore. I had to protect my honor. I kicked him very hard right between his legs. He screamed in pain and his friend was shocked. They were stunned and dumbfounded. I used that brisk moment to run away and ran as fast as I could. I used that moment to save my own life. My mother was at home and saw my t-shirt was torn and asked me what had happened. I didn't answer her, instead I cried as loud as I could. I took shower right away, ripped of my t-shirt, feeling dirty and disgusted about myself, because I had been molested and almost raped. I asked why this thing was happening to me and no one was even bother to save me at that time. After shower, my mother questioned me and I told her everything what had happened to me. She cried and felt sorry for me. She called my father home and after that three of us went to the police station to report about that incident. The police took my report, interrogated me for almost an hour, and treated me like a dummy. They said that I was lucky that they didn't rape me. They also blamed me for jogging by myself as if I challenged the risk by myself. Not only they didn't give me any help, but also they even dare to ask money from me to expedite the investigation. The police suggested me not to jog by myself anymore. They promised to investigate this matter deeper. In fact, I believed they did nothing, as I had never got any notice about the incident since then.

74. On March 12, 2002, a female Indonesian immigrant filed an asylum application that contains an almost identical version of the sexual assault given in the ten applications described above. The only meaningful difference in the story is that the assault occurred while the applicant was cycling instead of jogging. This application had no stated preparer, but Ratna Hartanto was the applicant's interpreter at the asylum interview. On June 25, 2002, the application was granted by an asylum officer at the Arlington asylum office.

75. Immigration records show that this stock account of sexual assault was an effective fraud. Of the eleven applications described in paragraphs 72 through 74 above, five were granted by an asylum officer; three were denied by an immigration judge; one was withdrawn; and two await final adjudication.

Physical Attack Involving Thieves, a Knife, and an ATM

76. Between March 26, 2001, and June 18, 2001, eight female Indonesian immigrants filed applications for asylum that claimed that the applicant had been physically attacked at knife point by native Indonesians thieves who then forced the applicant to withdraw money from a nearby automated teller machine to give to them. The following chart summarizes for each application (1) the date of filing, (2) the name of the preparer, (3) the address of the preparer, (4) the applicant's claimed state of residence, and (5) the location of the asylum office charged with adjudicating the application.

<i>Date of Filing</i>	<i>Name of Preparer</i>	<i>Address of Preparer</i>	<i>Applicant's Original State of Residence</i>	<i>Asylum Office</i>
3/26/01	Hans Gouw	6155 Pohick Station Drive, Fairfax Station, VA	Virginia	Arlington

4/11/01	Johnson Aliffin	6155 Pohick Station Drive, Fairfax Station, VA	Pennsylvania	Newark
4/25/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	New York	New York
5/15/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Virginia	Arlington
5/16/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Washington, but later changed to Virginia	Arlington
5/22/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Georgia	Arlington
5/31/01	No listed preparer	N/A	Georgia, but later changed to Virginia	Arlington
6/18/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Pennsylvania	Newark

77. In each application the claim appears largely verbatim with the exception of the relationship between the thieves, the precise words attributed to one of the thieves, and the position of the knife in relation to the applicant's neck or hip. In addition, in the application prepared by Johnson Aliffin the attack begins when the native woman feigns being hit by the applicant's car. With minor variation in phrasing, spelling, tense, and vocabulary, the following is the basic statement found in all eight applications (the errors in grammar are in the actual statements):

I experienced a horrifying experience, it was happened on October 1994. I went to Plaza Indonesia to do some errand. In the parking garage, before I opened the door of my car, there was a native lady was lying on the floor and screaming as if she was in pain. She also screamed for help. I approached and asked her whether I could do something to help her. She grabbed my hand and told me to keep my mouth shut. Even worse, she put a knife onto my neck and ordered me to go inside of my car. I heard her whistled and saw 1 native guy came and approached my car. He told her to move at the back seat and keep threatening me. I was very shocked for a while and started to cry. I begged them to have mercy on me and let me go. Not only that, but I also told them that they can have my car. The girl asked me whether my religion was Christian or not. I answered that I was Christian. Beside, I had cross hanging in the front mirror. The man turned his body, looked at me angrily, slapped my face, and yelled at me to shut up. He took the cross, spat on it, bend and threw it. He said 'I hate all Christian and Chinese people because you all richer than me. You robbed my country; if you don't give us the money then get the hell out of here.' She ordered me to give her my watch and also my money. I didn't carry a lot of money at that time and that made them angry. The guy ordered me to take out all of my money from the

ATM machine. He also suggested her to come along with me to take money from the nearest ATM machine in the mall. He also warned me not to run away and did stupid thing. He ordered the woman to kill me without any hesitation at all. She ordered me to step down from my car and headed toward the mall. She walked very close to my side with a knife pointing at my hip. I was very terrified so I did exactly as she told me to. I emptied all my money from the machine and she put all of them in her bag. She smiled and looked excited when she received money from me. I tried to negotiate with her to let me go since she already had my money and my car. She told me to go back to the car. She also mentioned that it wasn't her decision to let me go but her brother's. When we got back to the car, the guy asked me for the title of the car. He ordered his sister to throw me out from the car as we passed by an empty street. I begged them not to do that and let me go. That I wouldn't report to the police. I also mentioned that they already had my car and my money and therefore in a return not to harm me any longer. They laughed for my offer. She opened the door and kicked my back real hard. I was rolling down on the ground then I got up unstably. My head was spinning as I tried to stand up. I saw blood coming down from my nose. I wanted to scream and let every one know about that but I couldn't. My blouse was torn and knees were scratched. After that, I was sitting down on the roadside hoping that any car would pass so that I could get any help. Instead, after waiting for half and hour, one car passed by but it didn't stop. I tried to stop second, third and the fourth cars and finally the fifth car stopped. The Chinese young man stepped down from the car and asked me if I needed any help. He also asked what had happened because he saw my blouse was ripped off. He offered me to take me home and also gave me his jacket to cover my body. On the way home, he advised me not to report the incident to the police.

78. Immigration records show that this stock account of a physical assault and robbery was an effective fraud. Of the eight applications described above, three were granted by an asylum officer; two were granted by an immigration judge; and three were denied by an immigration judge.

Parent Sought to Convert Muslims to Christianity

79. Between February 15, 2001, and November 6, 2002, eighteen Indonesian immigrants filed applications for asylum that claimed that the applicant's house had been defiled and the applicant abused by native Indonesians because the applicant's parent had sought to convert Muslims to Christianity. The following chart summarizes for each

application (1) the date of filing, (2) the name of the preparer, (3) the address of the preparer, (4) the applicant's claimed state of residence, and (5) the location of the asylum office charged with adjudicating the application.

<i>Date of Filing</i>	<i>Name of Preparer</i>	<i>Address of Preparer</i>	<i>Applicant's Original State of Residence</i>	<i>Asylum Office</i>
2/15/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
3/01/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
3/22/01	Hans Gouw	6155 Pohick Station Drive, Fairfax Station, VA	Virginia	Arlington
4/20/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Maryland	Arlington
4/30/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Indiana	Chicago
5/14/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Pennsylvania	Newark
5/15/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Virginia	Arlington
5/16/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Washington, but later changed to Virginia	Arlington
5/23/01	No listed preparer	N/A	Iowa, but later changed to Virginia	Arlington
5/25/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Pennsylvania	Newark
6/18/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Pennsylvania	Newark
6/25/01	No listed preparer	N/A	Virginia	Newark
7/02/01	No listed preparer	N/A	Pennsylvania	Newark
8/02/01	No listed preparer	N/A	Iowa	Chicago
7/03/02	No listed preparer	N/A	Washington	Arlington
9/03/02	No listed preparer	N/A	Washington	San Francisco
10/25/02	No listed preparer	N/A	Washington	Arlington
11/06/02	No listed preparer	N/A	Washington	San Francisco

80. In each application the claim appears largely verbatim with the exception of the gender and Christian denomination of the parent. With minor variation in phrasing, spelling, tense, and vocabulary, the following is the basic statement found in all eighteen applications:

My father was an active member of Catholic Church in our area; he contributed time and money for establishing new churches in the area. He worked actively to convert Moslems into Christian. The natives were very angry when they found out that some natives had interest in Christian and wanted to become Christian. They sprayed our house with garbage, animal dirt and even worst with acid hazard chemical. The worst of all, they threw stones and other sharp objects such as broken glass as I passed in front of them. They called me Chink and Amoy - a racist remark for young Chinese girl and spat on me. I was very humiliated about that.

81. Immigration records show that this stock account religious persecution was an effective fraud. Of the eighteen applications described above, five were granted: three by an asylum officer, two by an immigration judge. Of the remaining thirteen, an immigration judge denied five, and eight await final adjudication.

Natives Making Fun of the Applicant

82. Between December 7, 2000, and March 18, 2003, forty-four Indonesian immigrants filed applications for asylum that claimed that the applicant had been made fun of by native Indonesians on account of the applicant's Chinese ancestry. The following chart summarizes for each application (1) the date of filing, (2) the name of the preparer, (3) the address of the preparer, (4) the applicant's claimed state of residence, and (5) the location of the asylum office charged with adjudicating the application.

<i>Date of Filing</i>	<i>Name of Preparer</i>	<i>Address of Preparer</i>	<i>Applicant's Original State of Residence</i>	<i>Asylum Office</i>
12/07/00	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
2/01/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
2/06/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
2/06/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
2/06/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
2/13/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
2/15/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington

2/16/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
2/16/01	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
4/12/01	Johnson Aliffin	6155 Pohick Station Drive, Fairfax Station, VA	Arizona	Los Angeles
4/13/01	Johnson Aliffin	6155 Pohick Station Drive, Fairfax Station, VA	Montana	Chicago
4/20/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Maryland	Arlington
4/30/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Indiana	Chicago
5/15/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Virginia	Arlington
5/18/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Ohio	Chicago
5/22/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Georgia	Arlington
5/23/01	No listed preparer	N/A	Iowa, but later changed to Virginia	Arlington
5/25/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Pennsylvania	Newark
5/25/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Texas	Houston
5/30/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	California	Los Angeles
5/31/01	No listed preparer	N/A	Georgia	Arlington
6/09/01	Danny Susanto	6155 Pohick Station Drive, Fairfax Station, VA	Pennsylvania	Newark
6/25/01	No listed preparer	N/A	Virginia	Newark
7/02/01	No listed preparer	N/A	Pennsylvania	Newark
7/02/01	No listed preparer	N/A	Pennsylvania	Newark
7/23/01	No listed preparer	N/A	Iowa, but later changed to Virginia	Arlington
7/31/01	No listed preparer	N/A	California	Los Angeles
8/2/01	No listed preparer	N/A	Iowa	Chicago
8/2/01	No listed preparer	N/A	Texas	Houston
8/9/01	No listed preparer	N/A	Pennsylvania	Newark
8/24/01	No listed preparer	N/A	Wyoming, but later changed to Virginia	Arlington
9/12/01	No listed preparer	N/A	Pennsylvania	Newark
1/16/02	No listed preparer	N/A	Virginia	Arlington
3/12/02	No listed preparer	N/A	Virginia	Arlington
3/25/02	No listed preparer	N/A	Virginia	Arlington
7/05/02	No listed preparer	N/A	Virginia	Arlington
7/30/02	No listed preparer	N/A	Washington	Arlington

8/21/02	No listed preparer	N/A	Washington, later changed to Virginia	Arlington
9/03/02	No listed preparer	N/A	Washington	San Francisco
10/25/02	No listed preparer	N/A	Washington	Arlington
10/31/02	No listed preparer	N/A	Washington, later changed to Virginia	Arlington
11/25/02	No listed preparer	N/A	Virginia	Arlington
1/07/03	No listed preparer	N/A	Virginia	Arlington
3/18/03	No listed preparer	N/A	Alabama	Arlington

83. In each application the claim appears largely verbatim with the exception of gender. With minor variation in phrasing, spelling, tense, and vocabulary, the following is the basic statement found in all forty-four applications:

As soon as I stepped out of the house, all eyes of the natives were all over me. They started calling me ‘akew’ [or ‘amoy’ for female applicants] and making fun of me. They would say some Chinese words or maybe words like Chinese which they made up by their own and which I didn’t really understand what they were saying. Sometimes they didn’t allow me to pass; even sometimes they came to me and asked for money [or touched me]. I always had a big argument with my mother [father in one application] if she asked me to go to the store to buy something.

84. Immigration records show that this stock account of harassment was an effective fraud. Of the forty-four applications described above, twenty-seven have been adjudicated on the merits. Of those, an asylum officer granted eleven and denied one, and an immigration judge granted five and denied ten. Of the seventeen applications that have not been adjudicated on the merits, thirteen await adjudication and four have been withdrawn or closed.

Kidnaped by Natives and Robbed

85. Between November 15, 2000, and August 5, 2003, eight Indonesian immigrants filed applications for asylum in which the applicant claimed that the

applicant had been kidnaped by native Indonesians on account of the applicant's Chinese ancestry. The following chart summarizes for each application (1) the date of filing, (2) the name of the preparer, (3) the address of the preparer, (4) the applicant's claimed state of residence, and (5) the location of the asylum office charged with adjudicating the application.

<i>Date of Filing</i>	<i>Name of Preparer</i>	<i>Address of Preparer</i>	<i>Applicant's Original State of Residence</i>	<i>Asylum Office</i>
11/15/00	Hans Gouw	10079 Chestnut Wood Lane, Burke, VA	Virginia	Arlington
5/03/01	Henry Lee	6155 Pohick Station Drive, Fairfax Station, VA	Georgia	Arlington
10/29/01	No listed preparer	N/A	Virginia	Arlington
4/24/02	No listed preparer	N/A	Florida	Miami
7/05/02	No listed preparer	N/A	Virginia	Arlington
11/25/02	No listed preparer	N/A	Maryland	Arlington
1/07/03	No listed preparer	N/A	Virginia	Arlington
8/05/03	No listed preparer	N/A	Colorado	Houston

86. In each application the claim appears virtually verbatim with the exception of geographic location, the amount of money robbed, and the slurs made by the attackers.

With minor variation in spelling, tense, and vocabulary, the following is the basic statement found in all eight applications:

[I was walking on a street when] suddenly a young native boy was already walking next to me. He was walking very close to me and suddenly I felt something sharp was pointed just underneath my belly skin. I was shock and when I turned my head to him, I saw a hand knife pointed on my belly. The boy was starring at me and said, "keep walking Chinese dog and just walked casually or I will stabbed you". I did what he said because I didn't want to be killed. I was trembling and my face turned pale immediately. Suddenly a car stopped in front of us, and another two natives in their mid-twenties came out of the car. They opened the back door of the car and suddenly the boy pushed me inside the car. Then all of them got into the car and drove away. The boy was sitting next to me pointing his blade at me. I asked them what they wanted from me and they said, "We want to ripped-off Chinese dogs from our land!". I was really hopeless

and all I could do was only praying so that they would not harm me. I tried to open the door and to jump out of the car, but the door cannot be opened from inside. When I tried to open the window, I could not find the handle to pull the window down. They were driving around for quite some time before they stopped. I recognized the place. It was a parking lot in a shopping mall on the outskirts of Ujung Pandang. The parking lot was already empty because the shopping mall was already closed. They went out of the car and then they dragged me out of the car. They blindfolded me and then dragged my hand to follow them. All the way, they just mocked and swore at me with some racist words. After walking for almost ten or fifteen minutes, we arrived in a building. I knew it because I heard them open a door and then we passed through the door. Then they opened the blindfold and I realized I was in a small room. There was no window in that room. Then they searched my body, took out my wallet and then they searched it. They found my ID, Driver's license, my check card, and my money. When they saw my money was only 150 thousand rupiahs. They were angry, kicked my stomach, and yelled at me, "Is that all you have?" I took a deep breath and said, "Yes." He showed my check card and my credit card in front of my face and then he told me that if I wanted to stay alive, I had to tell them the PIN numbers. I just kept quiet, so they felt impatient and hit my face. Blood was coming out from my nose. It was very hurt. I couldn't stand it, so I told them the PIN numbers. Then two of them went out to the bank to check the PIN numbers and to take the cash advanced. One of them stayed behind. He tied up my legs and my hands. I said that I was thirsty and asked some water, but instead of giving me water, he slapped my face and said, "shut up you dirty pig!" Not long after that, his friends came back. They had some money from my check card and my credit card. They have two million rupiahs from those two cards of mine. One of them said, "We have to keep you Chinese dog for another days before we could let you go. We have four more millions to be drawn from your account!" I was kept in that room for the whole night. I felt very thirsty and weak, so asked them to give me water to drink, but they hit me severely instead. I was exhausted and fell asleep. Suddenly they threw a bucket of water and kicked me. I was shocked and jumped, but I fell down because my legs were tied up. They were laughing at me. In the morning, they left me alone in that room. I guessed they were going to the ATM to take another cash advanced. They came back in the afternoon. They looked very happy. They counted the money in front of me. They also bought some food and drinks. Then they ate and drank in front of me. I was really starving and thirsty, so I asked them to give me some food and drinks. They turned their face and then they spread rice on the floor and said, "C'mon Chinese dog, eat". Then they put some water on a plastic glass and put in front of me. I was really humiliated and heavily insulted by their treatment. They treated me as if I was a dog. After they had finished eating, they went out again, left me alone in that room. I was really thirsty, so I drank the water like a thirsty dog.

87. In two of the applications, the claim goes on to describe the applicant's rescue by motorcyclists seeking shelter from the rain who hear the applicant's screams and release him from the room. In the other six applications, the attackers push the applicant from a car in a remote location, where a middle-aged man ultimately stops and assists the applicant.

88. Immigration records show that this stock account of kidnaping and robbery could be an effective fraud. Of the eight applications described above, two were granted by an asylum officer. Of the remaining six, an asylum officer denied two, an immigration judge denied three, and one awaits final adjudication.

Criminal Involvement of Hans Gouw, Henry Lee, Danny Susanto, and Johnson Aliffin

89. The applications summarized above clearly show that Hans Gouw, Henry Lee, Danny Susanto, and Johnson Aliffin were jointly engaged in asylum fraud. First of all, each false story was first presented in an application prepared by Hans Gouw and then recycled by Lee, Susanto, or Aliffin in later applications on behalf of different applicants. It is no coincidence that Lee, Susanto, and Aliffin all worked for Gouw and gave their address as preparers as 6155 Pohick Station Drive. Second, the stories are highly particular and describe events of a very serious, unusual, and personal nature. It is inconceivable that such claims of persecution actually happened to so many different people in exactly the same manner.

Identification of Hans Gouw, Henry Lee, Danny Susanto, and Johnson Aliffin

90. I know that the Hans Gouw, Henry Lee, Danny Susanto, and Johnson Aliffin listed as the preparers on the above described asylum applications are the Hans Gouw, Henry Lee, Danny Susanto, and Johnson Aliffin I am investigating and seek to arrest for

the following reasons. First, their names are the same. Second, I have compared their signatures on the asylum applications with their known signatures on their driver's licenses and determined that they match. Third, the addresses the men use when signing as preparer in the applications are the known addresses of CIAS. Finally, I know from my investigation the Hans Gouw, Henry Lee, Danny Susanto, and Johnson Aliffin I am investigating are in fact individuals who prepare fraudulent asylum applications for Indonesian immigrants through CIAS.

C. Specific Instances of Fraud Involving the Asylum Applications of Certain Targets

91. My colleagues' and my review of the asylum applications filed by the targets also revealed that a number of the targets obtained their own immigration status by means of a fraudulent asylum application. In particular, a number of targets applied for asylum using boilerplate claims of persecution taken from previously filed applications. In most instances, the boilerplate is essentially verbatim and describes a specific instance of persecution that could not reasonably have happened twice.

Brigitta Parera's Asylum Application

92. On May 3, 2001, Brigitta Parera filed an asylum application at the CIS service center in Texas. This application lists Parera's name as "Maria Yohana" and identifies an alias of "Yoh Mei En." I have compared the photograph of "Maria Yohana" that was attached to the application with Parera's known photograph on her Virginia driver's license and have determined that they match. According to the application, Parera's residential address at the time was "c/o 11104 Gainsborough Court, Fairfax, Virginia" and her mailing address was "c/o CIAS P.O. Box 7249, Fairfax Station, Virginia." Henry Lee is the listed preparer of the application, and his signature matches

the signature of the Henry Lee I am investigating. In the application, Parera claims past persecution in Indonesia on account of her race, religion, and ethnicity. This claim is supported by a signed declaration of facts attached to the application. On June 13, 2001, an asylum officer at the asylum office in Arlington, Virginia interviewed Parera and referred her application to an immigration judge for further review. On November 14, 2002, an immigration judge in Arlington, Virginia, granted Parera's asylum application.

93. I know that Parera's application is fraudulent for several reasons. First, I know that Parera's application includes introductory, boilerplate information that appears in hundreds of the other applications my colleagues and I reviewed in detail. Second, Parera's application is one of the fourteen applications that contains the story of sexual assault by a taxi driver described in paragraphs 67 through 71. As six of these applications were filed before her application, it is clear her taxi driver story was not original, but was rather a false copy. Third, Parera's application also includes a twenty-eight-sentence story about an incident when two native Indonesian men on a motorcycle pushed over the trishaw in which she and her mother were riding. That story, with almost no variation other than the name of the vehicle, appears in three other asylum applications filed by Indonesians, all of which were filed before Parera's application. Finally, on March 29, 2001, Parera, using the name Brigitta Laibahas, served as the interpreter for one of the seven applicants who used the taxi driver story before her, demonstrating that she knew of the story before she used it herself.

Ratna Hartanto's Asylum Application

94. On January 19, 2001, Ratna Hartanto filed an asylum application at the CIS service center in Texas. On the application, Hartanto's date of birth is listed as June 17,

1966, and her address as “c/o Isnayanti 6155 Pohick Station Drive, Fairfax Station, Virginia.” Hans Gouw is listed as the preparer at the address of 10079 Chestnut Wood Lane, Burke, Virginia. I have compared Hartanto’s signature on this application with Hartanto’s known signature on her driver’s license and have determined that they match. In addition, the date of birth on this application is the same as the date of birth of the Hartanto I am investigating. In the application, Hartanto claims past persecution in Indonesia on account of her race and religion. This claim is supported by a signed declaration of facts attached to the application. On May 29, 2001, an asylum officer at the asylum office in Arlington, Virginia, granted Hartanto’s application.

95. I know that Hartanto’s application is fraudulent for several reasons. First, Hartanto’s application includes introductory, boilerplate information that appears in hundreds of the other applications my colleagues and I reviewed in detail. Second, her application alleges that she was sexually assaulted by five Muslim teenagers on the way home from school. The application states that she escaped from the teenagers when she kicked one of the attackers between the legs, thereby leaving the attackers “numb and dumbfounded” and giving her the opportunity to use the “brisk moment” to run away. The application also alleges that, when she turned to police for help, the police interrogated her for almost an hour, treated her like a culprit, blamed her for challenging “risk,” and stated that she was lucky that she was not raped. This description of her escape and the subsequent reaction of police mirrors the language used in the “attacked while jogging” story described in paragraphs 72 through 75 above. Third, Hartanto’s application also alleges that her attackers compared her to a “porn star” in “blue films,” language that appears in many other applications prepared by Hans Gouw. Finally,

Hartanto also alleges that she opened her own business, which business was later ransacked and destroyed by fifty youngsters holding an assortment of weapons. The language used in this story appears throughout hundreds of other declarations reviewed by me and my team.

Lestari Nugroho's Asylum Application

96. On May 16, 2001, Lestari Nugroho filed an asylum application at the CIS service center in Nebraska. The mailing envelope bears a CIAS return address and a Fairfax Station, Virginia, postmark. Henry Lee is the stated preparer at 6155 Pohick Station Drive, Fairfax Station, Virginia. The application lists Nugroho's residential address as "2223 Benson Road S. Renton, Washington" and her mailing address as "c/o CIAS P.O. Box 7249, Fairfax Station, Virginia." I have compared the signature on Nugroho's application with Nugroho's known signature on her driver's license and other immigration forms and have determined that the signatures match. In addition, the date of birth on this application is the same as the date of birth of the Nugroho I am investigating. In the application, Nugroho claims past persecution in Indonesia on account of her race and religion. A declaration attached to the application purports to support Nugroho's claim. On or about February 25, 2002, an asylum officer considered Nugroho's application at the asylum office in Arlington, Virginia. The same officer then granted the application on March 5, 2002.

97. I know that Nugroho's application is fraudulent for several reasons. First, Nugroho's application includes introductory, boilerplate information that appears throughout hundreds of other applications that my colleagues and I reviewed in detail. Second, Nugroho's application alleges that she was sexually assaulted while jogging.

The same story, discussed in paragraphs 72 through 75 above, appears in the applications of ten other Indonesian asylum applicants, four of whom filed their applications before Nugroho's. Third, Nugroho's application alleges that she was abducted at knife point and forced to withdraw money from an ATM. That same story, discussed in paragraphs 76 through 78 above, appears in the applications of seven other Indonesian asylum applicants, four of whom filed their applications before Nugroho's. Finally, Nugroho's application alleges that her parents sought to convert Muslims to Christianity and was persecuted as a result. This same story, discussed in paragraphs 79 through 81 above, appears in seventeen other applications, seven of which were filed before Nugroho's.

Johnson Aliffin's Asylum Application

98. On November 6, 2000, Johnson Aliffin filed an asylum application at the CIS service center in Texas. This application lists Aliffin's date of birth as April 15, 1971, and his address as "c/o Chinese Indonesian American Society, 10079 Chestnut Wood Lane, Burke, Virginia." I have compared Aliffin's signature on this application with Aliffin's known signature on his driver's license and have determined that they match. In addition, Aliffin's date of birth on this application is the same as the date of birth of the Aliffin I am investigating. In the application, Aliffin claims he was persecuted on account of his race and religion in Indonesia. This claim is supported by a signed declaration of facts attached to the application. On December 13, 2000, an asylum officer considered Aliffin's application at the asylum office in Arlington, Virginia. The officer referred Aliffin's application to an immigration judge for further review, and the immigration judge granted the application on April 23, 2001.

99. I know that Aliffin's application is fraudulent for several reasons. First, Aliffin's application includes introductory, boilerplate information that appears in hundreds of the other applications my colleagues and I reviewed in detail. Second, Aliffin's application alleges that he was attacked when returning home one night from the college he was attending in Indonesia in 1990. A very similar story appears in the applications of seven other Indonesian applicants, three of which applications were filed before Aliffin's. Third, Aliffin's application further alleges that, while at work, a mob directed by motorcyclists attacked his office. At least fifteen other Indonesian asylum applications connected with this case also include such a claim, one of which was filed before Aliffin's. Finally, Aliffin's application also alleges that he was attacked by young Muslims on a bus who were checking the identification of passengers to determine their religion. This story appears in very similar form in thirty-four other asylum applications connected to this case, two of which were filed before Aliffin's and another two of which Aliffin later prepared.

D. Specific Examples of Fraud Involving Confidential Informants or Witnesses

100. I also know that Hans Gouw, Isnayanti Gouw, Jenny Gandasaputra, Johnson Aliffin, Ratna Hartanto, Rosita Setyawati, Brigitta Parera, Willy Irsan, Achnita Supomo, Lestari Nugroho, Hanny Kembuan, Herlina Suherman, Surya Halim, Danny Susanto, Henry Lee, Megawaty Gandasaputra, Silvy Karageorge, and Nany Kumala have engaged in asylum fraud because several of the confidential informants and witnesses assisting me approached one or more of the these same targets and obtained asylum applications from them under of obviously fraudulent circumstances in return for a fee. For the sake of brevity, I will not recount the details of every successful approach made by a confidential

informant. Rather, I will summarize some of them for the Court below and highlight particularly significant transactions. Each summary is based on one or more of the following: the recollections of the confidential informant; the personal observations of an agent; a recorded conversation or meeting; and documents prepared by the targets.

Specific Instance of Fraud Involving Herlina Suherman and Hans Gouw

101. From on or about July 30, 2003, continuing through on or about October 22, 2004, Herlina Suherman and Hans Gouw knowingly helped CI-2 to apply for asylum by fraud through CIAS. During this time, CI-2 used an alias and posed as an Indonesian immigrant seeking a green card to remain in the United States. In exchange for Suherman and Gouw's assistance, CI-2 paid CIAS a total of \$2,100 in fees: \$2,000 as an asylum fee and \$100 as a CIAS membership fee. As a result of CI-2's interaction with Suherman and Gouw, CIAS filed a fraudulent asylum application for CI-2 on October 22, 2004, at the CIS service center in Nebraska.

102. The asylum application CIAS filed on CI-2's behalf on October 22, 2004, uses CI-2's alias and is signed by CI-2 under this alias. The application states that, as of the time of filing, CI-2's address in the United States was 12102 4th Avenue West, Everett, Washington. It further states that CI-2 seeks asylum from Indonesia on account of his membership in a particular social group. An Indonesian birth certificate and declaration of facts are attached to the application as supporting documentation. The birth certificate purports to be for CI-2 and to have been prepared in Jakarta on January 8, 2001, by the Head of Civil Registry in Jakarta. The declaration claims that CI-2 fled Indonesia in 2001 for the United States after suffering from persecution due to his membership in "Pemuda Panca Marga organization." In particular, the declaration

alleges that, while CI-2 was changing a flat tire, a motorcycle pulled over and the riders determined that CI-2 was a member of Pemuda Panca Marga. The declaration then alleges that the motorcycle riders struck CI-2 with a wrench and beat CI-2 until his nose and ears bled.

103. CI-2's asylum application is fraudulent for several reasons. First, I know that CI-2 obtained the application by approaching Suherman and agreeing to pay CIAS \$2,000 for it. Second, CI-2 openly discussed fraud with Suherman. Third, CI-2 has never lived at 12102 4th Avenue West, Everett, Washington. Fourth, the application contains an Indonesian birth certificate under CI-2's alias that was purportedly prepared in Jakarta on January 8, 2001, by the Head of Civil Registry in Jakarta, and later translated into English on October 16, 2004. CI-2 never presented this birth certificate to Suherman or Gouw. Rather, it was concocted by Gouw or someone acting at Gouw's direction. CI-2 was in fact born in Indonesia, but of course under his true name, not the alias reflected in the certificate. Fifth, CI-2 did not prepare the declaration attached to his application and did not give Suherman or Gouw the information presented in the declaration. On the contrary, the allegations of persecution are fictitious and the creation of Suherman, Gouw, or someone acting at their direction. Finally, the application fails to disclose the role of CIAS in preparing the application.

104. CI-2's asylum application actually came about as follows. On July 20, 2003, CI-2 called Suherman and sought her advice on how to obtain a "green card." According to CIAS advertisements in the *Indonesian Journal*, Suherman at the time of the call was CIAS's "Mid-West representative." Suherman recommended that CI-2 apply for asylum at a cost of \$2000, \$1,000 of which would be due up front. When CI-2 asked Suherman

what CI-2 needed to do to pursue asylum, Suherman said CI-2 need do nothing other than sign an asylum application and send to Suherman a photograph and copy of his passport.

105. During a telephone conversation on July 31, 2003, CI-2 told Suherman he was Muslim and asked Suherman if that would be a problem. Suherman stated that they could use a “political problem” as the basis for a Muslim’s asylum claim. Suherman also recounted that, although some Muslims had used “political reasons” as the basis for their applications, other Muslims had claimed to be Christian. Suherman clarified that, as part of the \$2,000 fee, her boss would “make” an asylum story for CI-2 “based on other people’s stories.” Suherman told CI-2 that she usually served as the contact person for her boss and received a commission on each asylum application that she typed.

106. On January 2, 2004, CI-2 received a blank asylum application from Herlina Suherman. The asylum application arrived in a Federal Express envelope containing a return address of “Hanny K.,” CIAS Incorporated, 6155 Pohick Station Drive, Fairfax Station, Virginia. Tabs affixed to the blank asylum application indicated where CI-2 was to sign. CI-2 called Suherman on January 2, 2004, and Suherman told CI-2 to sign the blank asylum application, complete the CIAS membership application, and return the forms to CIAS. CI-2 called Suherman on April 20, 2004, to check the status of the application. Suherman advised CI-2 that she was soon returning to Indonesia and that CI-2 should contact “Hanny” at CIAS. On April 29, 2004, CI-2 called CIAS and spoke to Hans Gouw, who informed CI-2 that Hanny had returned to Indonesia. On July 9, 2004, Isnayanti Gouw told CI-2 that Suherman and Hanny both denied receiving \$2100 from CI-2. Isnayanti Gouw, however, told CI-2 that if CI-2 could prove payment, CIAS would give CI-2 a fifty-percent discount to continue the asylum application process.

107. On August 16, 2004, CI-2 mailed money orders totaling \$2,100, along with the signed, blank asylum application directly to CIAS in Virginia. On August 17, 2004, CI-2 received a Federal Express envelope with a return address of CIAS, 6155 Pohick Station Drive, Fairfax Station, Virginia. That envelope contained a receipt signed by Hans Gouw acknowledging CI-2's payment of \$2,100, along with a blank asylum application. Tabs affixed to the application indicated where CI-2 was to sign. CI-2 signed the asylum application and mailed it to CIAS on September 9, 2004. In a letter with CIAS letterhead and a Northern Virginia postmark dated September 14, 2004, Hans Gouw advised CI-2 that CIAS was processing the asylum application and needed copies of certain pages from CI-2's passport and a copy of CI-2's birth certificate. For \$150, Gouw offered to prepare a birth certificate. On October 7, 2004, CI-2 mailed additional passport pages and a money order for \$150. CI-2's immigration file reflects that the asylum application filed by CIAS on CI-2's behalf was sent in a United States priority mail envelope. The envelope reveals that the application was sent on October 20, 2004, from Fairfax Station, Virginia. The CIS service center in Nebraska received the application on October 22, 2004.

Specific Example of Fraud Involving Isnayanti Gouw, Hans Gouw, and Willy Irsan

108. From on or about May 13, 2003, continuing through on or about October 21, 2003, Isnayanti Gouw, Hans Gouw, and Willy Irsan knowingly helped CI-4 to apply for asylum by fraud through CIAS. During this time, CI-4 posed as an Indonesian immigrant seeking a green card to remain in the United States and used an alias. CI-4 paid CIAS a total of \$2,650 in fees for the Gouws' and Irsan's assistance: \$2,000 as an asylum fee, \$500 as a "speed up" fee, and \$150 for a fake birth certificate. As a result of CI-4's

interaction with the two Gouws and Irsan, CIAS filed a fraudulent asylum application for CI-4 on July 21, 2003, at the CIS service center in Texas and helped him prepare for an interview before an asylum officer at the Arlington asylum office on October 21, 2003.

109. The asylum application CIAS filed on CI-4's behalf on July 21, 2003, uses CI-4's alias and is signed by CI-4 under this alias. The application states that, as of the time of filing, CI-4's address in the United States was 13105 Canova Drive, Manassas, Virginia. It further states that CI-4 seeks asylum from Indonesia on account of his membership in a particular social group. An Indonesian birth certificate and a declaration of facts are attached to the application as supporting documentation. The birth certificate purports to be for CI-4 and to have been prepared in Jakarta on May 12, 2003, by the Head of Civil Registry in Jakarta. The declaration claims that CI-4 fled Indonesia in 2001 for the United States after suffering from persecution at the hands of Indonesian police. In particular, the declaration alleges that Indonesian police severely mistreated CI-4 because he was an active member of Pemuda Panca Marga, a political organization led by Tommy Soeharto, the son of the former president of Indonesia. For example, the declaration states that in July 2001 three men, one of whom was in a police uniform, attacked CI-4 in his home. During the attack, the men beat him in the face and stomach until unconscious, then revived him and tortured him by repeatedly forcing his head completely under water in his bathroom until he collapsed again. According to the declaration, the men told CI-4 they were attacking him because he was a member of Pemuda Panca Marga.

110. CI-4's asylum application is fraudulent for several reasons. First, I know that CI-4 obtained the application by approaching Isnayanti Gouw and agreeing to pay

CIAS \$2,650 for it. Second, CI-4 openly discussed the fraudulent nature of the application with Isnayanti Gouw, Hans Gouw, and Irsan. Third, CI-4 has never lived at 13105 Canova Drive, Manassas, Virginia. Rather, 13105 Canova Drive, Manassas, Virginia, was the address of a house owned by Gouw (and now by Jenny Gandasaputra). Fourth, the application contains an Indonesian birth certificate under CI-4's alias that was purportedly prepared in Jakarta on May 12, 2003, by the Head of Civil Registry in Jakarta, and later translated into English on June 12, 2003. This birth certificate was not presented to the Gouws or Irsan by CI-4. Rather, it was concocted by Isnayanti Gouw using CI-4's alias for a fee of \$150. CI-4 was in fact born in Indonesia, but of course under his true name, not the alias reflected in the certificate. Fifth, CI-4 did not prepare the declaration attached to his application and did not give the Gouws or Irsan the information presented in it. On the contrary, the allegations of beatings, attempted drowning, and political persecution in the declaration are fictitious and the creation of Isnayanti Gouw or someone acting at her direction. Finally, the asylum application fails to disclose that the Gouws and Willy Irsan prepared the application as required and instead lists no preparer.

111. CI-4's fraudulent asylum application actually came about as follows. On May 13, 2003, CI-4 called Isnayanti Gouw and expressed an interest in applying for asylum. CI-4 told Gouw that he was Muslim and asked how that would affect his ability to make a claim. Gouw replied that she could “make” CI-4 an asylum story as if CI-4 were Christian provided CI-4 agreed. Upon learning that CI-4's name was “Abdullah,” Gouw stated that the name would present a difficulty but that she could arrange for a name change. Gouw told CI-4 that the fee for an asylum application would be \$2,000,

which fee CI-4 agreed to pay. Gouw added that she could make CI-4 a birth certificate for \$150 and a baptismal certificate for free. At the close of the conversation, Gouw and CI-4 agreed that CI-4 would go to the CIAS office at 6155 Pohick Station Drive to complete the necessary paperwork for the asylum application.

112. On or about May 29, 2003, CI-4 again called Isnayanti Gouw by telephone. CI-4 reminded Gouw of their previous conversation and asked Gouw if he could meet her on June 10, 2003, to complete the asylum application. Gouw agreed and told CI-4 to bring a copy of his passport and several photographs of himself. CI-4 also asked Gouw if Gouw could get CI-4 a driver's license and social security card. Gouw said she could, but only after CI-4's asylum application was filed with the INS.

113. On or about June 10, 2004, CI-4 met Isnayanti Gouw at Gouw's house located at 6155 Pohick Station Drive, Fairfax Station, Virginia. Gouw and CI-4 initially reviewed CI-4's passport and biographic information. Gouw then drove CI-4 to a local photography shop so that CI-4 could obtain photographs to include with his asylum application. CI-4 had his picture taken at the shop, and he and Gouw returned to Gouw's house. Once there, CI-4 and Gouw resumed their discussions. Gouw told CI-4 that she could speed up his asylum application for an additional \$500 fee, to which fee CI-4 agreed. At this point, Hans Gouw joined Isnayanti Gouw and CI-4's conversation. Hans Gouw reviewed the need for a birth certificate with CI-4 and told him that a possible asylum story could be that the situation in Indonesia was not secure and that CI-4's family was suggesting that CI-4 not come back due to the danger. Hans Gouw stated that they would train CI-4 based on a pattern of questions usually asked during an asylum interview and remarked that he had already handled between 700 to 800 such interviews.

Hans Gouw stated that “hopefully” the interviewer would “believe[]” the story and noted that most of the interviewers “have never been to Indonesia, they only heard about it.”

Hans Gouw told CI-4 “you can lie, but don’t do it half hearted, you have to be confident, you have to be convincing.”

114. During the meeting on June 10, 2003, CI-4 paid Hans and Isnayanti Gouw \$1,150 by U.S. Postal Service money orders: \$1,000 towards the asylum application fee and \$150 for the birth certificate fee. Hans Gouw gave CI-4 a written CIAS receipt for these payments which he signed. The receipt noted that CI-4 still owed \$1,500: \$1,000 towards the remainder of the asylum application fee and \$500 for a “speed up” fee. On July 15, 2003, CI-4 mailed the remaining \$1,500 in U.S. Postal Service money orders to Isnayanti Gouw at CIAS. On July 19, 2003, Hans Gouw sent CI-4 a CIAS receipt for the \$1,500 payment by mail. This receipt was dated July 18, 2003, and was signed by Hans Gouw.

115. On August 8, 2003, someone at CIAS mailed CI-4 a notice from the asylum office in Arlington, Virginia, that informed CI-4 that his asylum application had been received and was pending. On October 7, 2003, CI-4 someone at CIAS mailed CI-4 another notice from the asylum office that informed CI-4 that his asylum interview had been scheduled for October 21, 2003. On October 15, 2003, CI-4 spoke to Hanny Kembuan and scheduled a meeting at CIAS on October 20, 2003, to prepare for his asylum interview.

116. On October 20, 2003, CI-4 met with Willy Irsan at 6155 Pohick Station Drive to prepare for his asylum interview at the Asylum office the following day. Irsan began by telling CI-4 “to talk bad about Indonesia” because “if we defend Indonesia in

front of these asylum people, we will get nothing, you know.” Irsan then informed CI-4 that the asylum story in CI-4's application revolved around CI-4's alleged membership in a group called “Panca Marga.” When CI-4 asked Irsan what Panca Marga meant, Irsan said he would tell him later. Irsan instructed CI-4 that when the asylum officer asked CI-4 why he was seeking asylum, CI-4 should not mention any economic reasons but should rather state that his life was being threatened due to his membership in Panca Marga.

117. Irsan told CI-4 to memorize the 13105 Canova Drive, Manassas, Virginia, address listed as CI-4's address in the asylum application. He further told CI-4 to tell the asylum officer that he had not worked since he arrived in the United States. Irsan then described a story consisting of “three parts” that CI-4 could use to explain how he has survived financially without working. Irsan told CI-4 to claim initially that he lived off his savings that he brought from Indonesia. Irsan recommended that CI-4 claim to have brought \$8,500 in savings, because more than \$10,000 triggered reporting requirements. Irsan told CI-4 that if the asylum officer seemed unsatisfied with this first answer, CI-4 should then say that he made a modest “side income” from cleaning the houses of “close friends” from time to time. If the officer remained unconvinced, Irsan told CI-4 to fall back on a third position which was that a “close relative” brought money to him once or twice per year. Irsan told CI-4 not to use all three answers at once, but to wait and use them “one by one” until the asylum officer seemed satisfied: “It’s like facing an enemy: we shoot with one bullet first; [if] not dead, use the second; the third will certainly kill.”

118. Midway through the meeting, Irsan began to review CI-4's asylum story with him in detail. This story was the same story presented in the declaration filed in

support of CI-4's asylum application. Irsan recited the story line by line and had CI-4 repeat each part of the story to him. Irsan told CI-4 to “study the story” and briefed him on the goals and activities of the Panca Marga. Irsan advised CI-4 that he could make up details about his specific functions in the group as long as they made sense. Irsan also told CI-4 to come to the interview “with a sad face” and to avoid laughing. Irsan further advised CI-4 that if he was unable to remember an answer, he should claim that he had forgotten due to his age and the passage of time. Irsan claimed that the asylum officer would likely accept such an explanation. When CI-4 asked Irsan who wrote the story in his declaration, Irsan stated “different people.” When CI-4 inquired further if Irsan had written any of it himself, Irsan answered that he had written “a large part,” but added that Hans Gouw had “arranged it.” At the close of the meeting, CI-4 and Irsan agreed to meet at the asylum office the next day.

119. On October 21, 2003, CI-4 met Irsan at the asylum office in Arlington, Virginia, and was called before an asylum officer at 10:15 a.m. for his interview. Irsan served as CI-4's interpreter. After the interview, Irsan seemed angry with CI-4 and told him that he had made many mistakes during the interview and had not properly remembered Irsan's instructions from the day before.

Specific Example of Fraud Involving Hans Gouw and Surya Halim

120. From on or about May 7, 2003, continuing through on or about October 21, 2003, Hans Gouw and Surya Halim knowingly helped CI-5 to apply for asylum by fraud through CIAS. During this time, CI-5 posed as an Indonesian immigrant seeking a green card to remain in the United States and used an alias. CI-5 paid CIAS a total of \$2,000 in fees for the asylum application. As a result of CI-5's interaction with Gouw and Halim,

CIAS filed a fraudulent asylum application for CI-5 on August 1, 2003, at the CIS service center in Texas and helped him prepare for an interview before an asylum officer at the Arlington asylum office on October 21, 2003.

121. The asylum application CIAS filed on CI-5's behalf on August 1, 2003, uses CI-5's alias and is signed by CI-5 under this alias. The application states that, as of the time of filing, CI-5's address in the United States was 13105 Canova Drive, Manassas, Virginia. It further states that CI-5 seeks asylum from Indonesia on account of his race and religion. An Indonesian birth certificate and a declaration of facts are attached to the application as supporting documentation. The birth certificate purports to be for CI-5 and to have been prepared in Jakarta on February 4, 2002, by the Head of Civil Registry in Jakarta. The declaration claims that CI-5 fled Indonesia in 2002 for the United States after suffering from persecution at the hands of Muslim extremists. In particular, the declaration alleges that in July 2002 a group of native Indonesians attacked CI-5 because he was a Chinese Christian. During the attack, CI-5's assailants tortured him until he fell unconscious. Specifically, they choked, punched, and kicked him until he was bleeding from the nose and mouth and ultimately fainted. The declaration states that shortly after this attack CI-5 decided to leave Indonesia as he feared for his life.

122. CI-5's asylum application is fraudulent for several reasons. First, I know that CI-5 obtained the application by approaching Hans Gouw and agreeing to pay CIAS \$2,000 for it. Second, CI-5 openly discussed the fraudulent nature of the application with both Hans Gouw and Surya Halim. Third, CI-5 has never lived at 13105 Canova Drive, Manassas, Virginia. Rather, 13105 Canova Drive, Manassas, Virginia, was the address of a house owned by Gouw (and now by Jenny Gandasaputra). Fourth, the application

contains an Indonesian birth certificate under CI-5's alias that was purportedly prepared in Jakarta on February 4, 2002, by the Head of Civil Registry in Jakarta, and later translated into English on July 14, 2003. CI-5 never presented this birth certificate to Gouw or Salim. Rather, it was concocted by Hans Gouw or someone acting at his direction. CI-5 was in fact born in Indonesia, but of course under his true name, not the alias reflected in the certificate. Fifth, CI-5 did not prepare the declaration attached to his application and did not give Gouw or Halim the information presented in it. On the contrary, the allegations of torture, beating, and choking in the declaration are fictitious and the creation of Hans Gouw or someone acting at his direction. Finally, the asylum application fails to disclose that Gouw prepared the application as required and instead lists no preparer.

123. CI-5's fraudulent asylum application actually came about as follows. On May 7, 2003, CI-5 called Jane Doe, an associate of Gouw's, and inquired about obtaining a social security card and work permit. Doe told CI-5 that his only option was to apply first for asylum, although asylum had become more difficult. On June 9, 2003, CI-5 called Doe again and told Doe that he was Muslim. On June 16, 2003, Doe and CI-5 spoke again on the telephone. Doe referred CI-5 to an attorney but warned CI-5 that, unless the asylum case was strong, an attorney would not accept the case. Doe alternatively suggested that CI-5 could travel to Virginia to meet with Hans Gouw. CI-5 and Doe planned to meet in Philadelphia, Pennsylvania on June 23, 2003, to discuss matters further.

124. On June 23, 2003, CI-5 met Doe at Doe's house in Philadelphia. Doe repeated her concern that an attorney would not file an asylum application for CI-5

unless CI-5 had a legitimate reason for fearing return to Indonesia. In particular, Doe explained that once an attorney heard that CI-5 was Muslim, the attorney likely would not file an asylum application. According to Doe, however, Hans Gouw was “the best arranging [asylum] for people using the Islam religion.” Doe stated that for \$2,000 Gouw would assist CI-5 in making an asylum story but that CI-5 had to be “prepared to do whatever it takes.” Doe then called Gouw and allowed CI-5 to speak directly to Gouw, who further explained they would have to make an asylum story. After the call, Doe told CI-5 that one of the attorneys she could refer him to would not help CI-5 create a good asylum story if CI-5 told the attorney he was a Muslim. This attorney would make CI-5 create the story, she said, “while Hans will do it for you.” CI-5 then began to negotiate with Doe to have Doe and Gouw prepare his asylum application. As the discussion went on, Doe became concerned that if she agreed to act as the intermediary, CI-5 would hold her responsible for what was essentially Gouw’s work. Therefore, Doe told CI-5 that it would be best to pursue asylum directly through Gouw. CI-5 agreed.

125. On June 30, 2003, CI-5 called Hans Gouw, and they agreed to meet to discuss CI-5's case. On July 11, 2003, CI-5 and Gouw met at Gouw’s house at 6155 Pohick Station Drive, Fairfax Station, Virginia. Gouw began the meeting by explaining the asylum process to CI-5 and telling him that CIAS would train CI-5 for the asylum interview. CI-5 in turn told Gouw that he was married and Muslim. The two men then agreed that Gouw would prepare an application for CI-5 for a fee of \$2,000, which fee CI-5 paid Gouw in Postal Service money orders. Gouw told CI-5 this fee was the for an unmarried applicant and that he would list CI-5 as such in his application. Gouw assured CI-5, however, that if CI-5 later wanted to add his wife, Gouw could “make a marriage

certificate” “as though [CI-5 was] only recently married.” Gouw also offered to have a birth certificate made for CI-5 in Indonesia for \$150. Gouw directed CI-5 to complete the general biographical portion of the asylum application. At that time, Gouw advised CI-5 that he would invent a Chinese name for at least one of CI-5's parents so that CI-5 could appear to be of Chinese ancestry. Gouw explained that pretending to have at least one Chinese parent would make CI-5's case stronger and provide CI-5 a reason for fearing return to Indonesia. Gouw also told CI-5 that CI-5 could make his asylum claim even stronger by falsely alleging that CI-5 was both Christian and of Chinese descent. That way CI-5 would have “a double problem” according to Gouw. When CI-5 asked Gouw if CI-5 could obtain the necessary documents to support such a claim, Gouw replied, “Sure you can, I can make your baptism certificate.” Gouw added that he had recently handled a similar case for a “native” (i.e., a non-Chinese and Muslim) Indonesian in which the man claimed to be a Chinese Christian during the asylum interview and was immediately granted asylum. Gouw further stated “Here, we lie only during the interview.”

126. At the end of the meeting, Gouw instructed CI-5 to go with “Hanny” [Kembuan] to get passport photographs taken at a local photography shop. On the way there, Kembuan and CI-5 discussed Gouw and his business. Kembuan told CI-5 that Gouw had handled hundreds of asylum claims since 1999, stating “Seven hundred, more, maybe eight hundred. . . Many are taking care of their status through him because many succeeded.”

127. On October 10, 2003, Gouw mailed CI-5 a notice from the asylum office in Arlington, Virginia, that informed CI-5 that his asylum application had been received and

that his asylum interview was scheduled for October 21, 2003. On October 17, 2003, Gouw sent CI-5 a further notice by Federal Express confirming that CI-5's asylum interview had been scheduled for October 21, 2003, at the asylum office in Arlington, Virginia. On this same notice, Gouw informed CI-5 that CI-5's "practice" session for the interview was scheduled for October 20, 2003. In the same Federal Express package, Gouw sent CI-5 a copy of the asylum application he had prepared and filed for CI-5 which application included a false birth certificate for CI-5.

128. On October 20, 2003, CI-5 met with Surya Halim, a CIAS interpreter, at Gouw's house at 6155 Pohick Station Drive, Fairfax Station, Virginia. Halim asked CI-5 if he had "already memorize[d] the story" and told CI-5 to memorize the "Canova" address listed as CI-5's address in the application. Halim reviewed with CI-5 the Chinese names Gouw had invented for CI-5's parents and further admitted to CI-5 that Gouw had created them. Halim stressed that CI-5 had to tell the asylum officer that he was afraid of returning to Indonesia and that he experienced discrimination and maltreatment when he lived in Indonesia. Halim then reviewed with CI-5 the content of the asylum story Gouw created for CI-5, including the allegations of torture and beatings. When CI-5 told Halim that he was Muslim and not Christian as the application alleged, Halim told CI-5 to tell the asylum officer that he was a Protestant and to invent the name of his pastor if asked. As a further aid, Halim provided CI-5 with a document listing the ten commandments, the names of books in the Bible, the names of the disciples, the names of important Christian holidays, and miraculous events involving Jesus. Halim also told CI-5 to say that he lived with "Abdullah and Doni" if the asylum officer asked about the address listed on the asylum application.

Specific Example of Fraud Involving Lestari Nugroho and Hans Gouw

129. From on or about August 6, 2003, continuing through on or about April 23, 2004, Lestari Nugroho and Hans Gouw knowingly helped CI-8 to apply for asylum by fraud through CIAS. During this time, CI-8 posed as an Indonesian immigrant seeking a green card to remain in the United States and used an alias. CI-8 paid CIAS a total of \$2,000 in fees for the asylum application. As a result of CI-8's interaction with the Nugroho and Gouw, CIAS filed a fraudulent asylum application for CI-8 on April 23, 2004, at the CIS service center in Texas. This filing was made by mail on April 21, 2004, from the U.S. post office in Fairfax Station, Virginia.

130. The asylum application CIAS filed on CI-8's behalf on April 23, 2004, uses CI-8's alias and is signed by CI-8 under this alias. The application states that as of the time of filing CI-8's address in the United States was 13105 Canova Drive, Manassas, Virginia. It further states that CI-8 seeks asylum from Indonesia on account of his race and religion. An Indonesian birth certificate and a declaration of facts are attached to the application as supporting documentation. The birth certificate purports to be for CI-8 and to have been prepared in Jakarta on May 1, 1986, by the Extraordinary Officer of Civil Registry. The declaration claims that CI-8 fled Indonesia for the United States after suffering from persecution at the hands of Muslim extremists. In particular, the declaration alleges that in May 2001 a group of twenty young men in Muslim outfits attacked CI-8's house because he was holding fellowship there with a group of Christian Indonesians of Chinese ancestry. During the attack, the attackers destroyed CI-8's house and attacked his brother. When CI-8 sought to help his brother, the attackers beat him

and knocked him unconscious with a stick. The declaration states that after this attack CI-8 decided to leave Indonesia as he feared for his life.

131. CI-8's asylum application is fraudulent for several reasons. First, I know that CI-8 obtained the application by approaching Lestari Nugroho and agreeing to pay her and Hans Gouw \$2,000 for it. Second, CI-8 has never lived at 13105 Canova Drive, Manassas, Virginia. Rather, 13105 Canova Drive, Manassas, Virginia, was the address of a house owned by Gouw (and now by Jenny Gandasaputra). Third, CI-8 never presented the birth certificate attached to CI-8's application to Nugroho or Gouw. Rather, it was concocted by Hans Gouw or someone acting at his direction. CI-8 was in fact born in Indonesia, but of course under his true name, not the alias reflected in the certificate. Fourth, CI-8 did not prepare the declaration attached to his application and did not give Nugroho or Gouw the information presented in it. On the contrary, the account of an attack on CI-8's house in the declaration is fictitious and the creation of Hans Gouw or someone acting at his direction. Finally, the asylum application fails to disclose that Nugroho and Gouw prepared the application as required and instead lists no preparer.

132. CI-8's fraudulent asylum application actually came about as follows. On August 6, 2003, CI-8 called Nugroho in Washington (the state). CI-8 told Nugroho he needed her help to stay in the United States legally. Nugroho suggested that CI-8 apply for asylum at a cost of \$2,000. Nugroho stated that if CI-8 agreed, Nugroho would send CI-8 all the necessary information and forms. CI-8 accepted her offer and gave Nugroho his address and telephone number.

133. On September 4, 2003, Nugroho sent CI-8 an asylum application, a labor certification application, and a CIAS questionnaire by way the U.S. post office in

Bellevue, Washington. On September 23, 2003, CI-8 called Nugroho and told her he had received the documents, but informed her he was only going to pursue asylum. Nugroho told CI-8 to fill in the CIAS questionnaire. With regard to the asylum application, however, Nugroho instructed CI-8 to sign it but not to date it or otherwise complete it. Nugroho further instructed CI-8 to send the questionnaire and asylum application to CIAS in Virginia in her care. She also directed CI-8 to make the payment for the asylum application payable to L.H. Gouw or Lestari/L.H. Gouw.

134. On October 24, 2003, agents assisting me mailed CI-8's questionnaire and asylum application to CIAS as instructed by Nugroho. CI-8 had completed the parts of the questionnaire that asked for his basic biographic information, but had specifically left blank that portion of the questionnaire that asked for information concerning any persecution or discrimination CI-8 had suffered in Indonesia. CI-8 had also signed the asylum application, but left it otherwise incomplete. Along with the questionnaire and asylum application, the agents included two Postal Service money orders from CI-8 made payable to Hans Gouw in the amount of \$1,000 each. On or about October 29, 2003, Hans Gouw endorsed and deposited both money orders.

135. On April 28, 2004, CI-8 called Nugroho, and Nugroho asked CI-8 for his physical address. CI-8 told Nugroho he was in San Diego but was moving around a lot and had no fixed address. CI-8 asked Nugroho if his application had been filed. Nugroho told CI-8 that it had been filed, but because CI-8's address on the application was a Virginia address, CI-8's asylum interview would be in Virginia.

136. On May 4, 2004, the asylum office sent CI-8 a notice at the address listed on CI-8's asylum application, namely 13105 Canova Drive, Manassas, Virginia. This notice

informed CI-8 that his asylum interview had been scheduled for May 25, 2004, at the asylum office in Arlington, Virginia. Hans Gouw never forwarded this notice to CI-8, so the interview passed without further action.

Specific Example of Fraud Involving Rosita Setyawati and Hans Gouw

137. Between May 13, 2003, and the present, Rosita Setyawati and Hans Gouw have knowingly helped CI-10, acting exclusively through her husband CI-9, to apply for asylum by fraud through CIAS. During this time, CI-9 posed as an Indonesian immigrant seeking a green card for his wife to remain in the United States. CI-9 paid CIAS a total of \$2,400 in fees for Setyawati and Gouw's assistance. As a result of CI-9's interaction with Setyawati and Gouw, CIAS filed a fraudulent asylum application for CI-10 on January 21, 2004, at the CIS service center in Texas.

138. The asylum application CIAS filed on CI-10's behalf on January 21, 2004, uses CI-10's true name and is signed by CI-10. No reference is made in the application to CIAS, Setyawati, or Gouw. The application states that CI-10 seeks asylum from Indonesia on account of her race and religion. An Indonesian birth certificate and a declaration of facts are attached to the application as supporting documentation. The birth certificate purports to have been prepared in Jakarta on December 20, 1995, by the Head of Civil Registry in Jakarta. The declaration claims that CI-10 fled Indonesia in 2002 for the United States after having been attacked by native Muslim Indonesians. In particular, the declaration alleges that CI-10 and her family were attacked by a mob of Muslim Indonesians holding steel bars and wooden bats while CI-10 and her family were hosting a prayer session and Bible study with other Christians in CI-10's home. According to the declaration, the mob shouted anti-Christian and anti-Chinese statements

and then beat the assembled Christians, including CI-10, CI-10's father, and CI-10's mother. CI-10 was beaten so badly that blood flowed from her nose and mouth and she lost consciousness. After spending more than a week in the hospital recovering, she fled the country for the United States fearing "further persecution, torture, and even death" should she return to Indonesia.

139. This application is fraudulent for several reasons. First, I know that CI-9 obtained the application on CI-10's behalf by paying CIAS \$2,400 to prepare it. Second, CI-9 openly discussed the fraudulent nature of the application with Setyawati. Third, the application contains an Indonesian birth certificate for CI-10 that was purportedly prepared in Jakarta on December 20, 1995, by the Head of Civil Registry and later translated into English on December 15, 2003. In fact, this birth certificate was fabricated by Setyawati and Gouw for a fee of \$100. Fourth, the application states that CI-10 is unmarried, when in fact Setyawati and Gouw know full well that CI-10 is married to CI-9. Fifth, CI-10 did not prepare the declaration attached to her application and neither she nor CI-9 gave Setyawati or Gouw the information presented in it. On the contrary, the assault on CI-10 and her family related in the declaration is fictitious and the creation of Setyawati, Gouw, or someone acting at their direction. Finally, the asylum application fails to disclose that Setyawati and Gouw prepared the application as required and instead lists no preparer.

140. CI-10's asylum application actually came about as follows. On or about May 13, 2003, CI-9 called Setyawati in Philadelphia. During the conversation, CI-9 told Setyawati he wanted to get an asylum application for his wife, CI-10. Setyawati told CI-9 the price would be \$2,000 plus the cost of any supporting documentation Setyawati

would have to produce. To that end, CI-9 and Setyawati openly discussed how Setyawati could obtain or produce baptismal and birth certificates for asylum applications. They also openly discussed how Setyawati could obtain a false social security card for CI-9 for \$50 from an associate in New York.

141. On June 9, 2003, CI-9 again called Setyawati in Philadelphia and set up a meeting at her house on June 23, 2003. On June 23, 2003, CI-9 and Setyawati met at Setyawati's house in Philadelphia. During this meeting, Setyawati discussed the asylum process with CI-9 and gave him some forms to complete, including a CIAS asylum questionnaire and a blank asylum application. Setyawati told CI-9 that his wife should only sign the asylum application because she, Setyawati, would fill it in later. CI-9 paid Setyawati \$2,400 in U.S. Postal Service money orders: \$2,000 for the asylum application: \$400 for supporting documentation, including a fake birth certificate. Setyawati gave CI-9 two receipts reflecting the amount and nature of each payment and marked "CIAS" at the bottom of both receipts. CI-9 and Setyawati also discussed how Setyawati could obtain a false social security card and a Virginia or Pennsylvania driver's license for CI-9 and CI-10.

142. A few days later, CI-9 sent Setyawati the CIAS asylum questionnaire and the last page of the asylum application Setyawati had given him for his wife, CI-10. CI-10 had signed, but not dated the signature page of the asylum application. CI-10 had also completed the CIAS questionnaire by providing basic biographic information about herself and by signing the last page. CI-10 had deliberately left blank, however, the section requesting information about any persecution or discrimination she suffered in Indonesia.

143. On September 21, 2003, CI-9 called Setyawati in Philadelphia and asked Setyawati about the status of CI-10's asylum application. Setyawati stated that she had not yet filed the application and was still waiting for the birth certificate to be produced. With regard to the birth certificate, Setyawati complained that it was difficult to get birth certificates and added, "[W]e still have to bribe." Setyawati also told CI-9 that when it came time for the asylum interview, Hans Gouw would send Billy, Gita [Brigitta Parera], or Surya [Halim] to Philadelphia to interpret for CI-10 at the interview.

144. On September 30, 2003, CI-9 called Setyawati in Philadelphia and asked about the status of CI-10's asylum application. Setyawati stated that it had been filed and that she or Gouw would inform him of the date of the asylum interview once it was scheduled.

145. On October 4, 2003, Hans Gouw sent CI-10 a receipt on CIAS letterhead confirming CI-9's earlier payment of \$2,000 for CI-10's asylum application. The receipt was dated October 3, 2003, and bore Gouw's signature. The envelope in which the receipt was mailed was addressed to CI-10 in care of Setyawati at Setyawati's Philadelphia address. The return address on the envelope was 6155 Pohick Station Drive, Fairfax Station, Virginia. The postal stamp on the envelope shows that it was mailed via the Postal Service from Northern Virginia on October 4, 2003.

146. On August 29, 2004, CI-9 called Setyawati in Philadelphia and asked what became of the fake social security card Setyawati said she would get CI-9. Setyawati stated that she had forgotten about it, but would work on it and call CI-9 back.

147. On September 24, 2004, my colleague mailed a notice of interview to 3854 Grosvenor's Drive, Montgomery, Alabama, the applicant address on CI-10's asylum

application. This notice, which was prepared on official CIS letterhead, informed CI-10 that her asylum interview had been scheduled for November 29, 2004, at the Asylum office in Atlanta, Georgia.

148. On October 19, 2004, Hans Gouw sent CI-10 a letter informing her that her asylum interview had been scheduled for November 29, 2004, at the asylum office in Atlanta, Georgia. This letter bore a return address of CIAS, Inc., 6155 Pohick Station Drive, Fairfax Station, Virginia, and a Northern Virginia postmark. In the letter, Gouw told CI-10 that if she wished, he could have the interview moved to Virginia or New Jersey.

149. On October 27, 2004, CI-9 called Setyawati in Philadelphia. CI-9 informed Setyawati that CI-10 had received a letter from the asylum office notifying CI-10 of her asylum interview. Setyawati advised CI-9 that CI-10 should move the interview to Virginia because it was easier to get approved in Virginia. Setyawati further stated that Gouw would help CI-10 memorize the asylum story and admitted that Gouw had created the story. Setyawati added that Gouw was good at helping clients make their asylum stories look true and suggested that CI-10 spend the night at Gouw's home in Virginia the night before the interview so that she could practice presenting the story. Setyawati closed the conversation by indicating that she would shortly obtain false social security cards for both CI-9 and CI-10 and reminded CI-9 that he owed her \$200 for the cards.

Specific Example of Fraud Involving Jenny Gandasaputra, Brigitta Parera,
and Hans Gouw

150. Between July 14, 2003, and September 17, 2003, Jenny Gandasaputra, Brigitta Parera, and Hans Gouw knowingly helped CI-10 to apply for asylum by fraud

through CIAS. During this time, CI-10 posed as an Indonesian immigrant seeking a green card to remain in the United States and used an alias. CI-10 paid CIAS a total of \$2,750 in fees for Gandasaputra, Parera, and Gouw's assistance. As a result of CI-10's interaction with Gandasaputra, Parera, and Gouw, CIAS filed a fraudulent asylum application for CI-10 on August 14, 2003, at the CIS service center in Texas and helped her prepare for an interview before an asylum officer on September 17, 2003.

151. The asylum application CIAS filed on CI-10's behalf on August 14, 2003, uses CI-10's alias and is signed by CI-10 under this alias. No reference is made in the application to CIAS, Gandasaputra, Parera, or Gouw. The application states that, as of the time of filing, CI-10's address in the United States was 13105 Canova Drive, Manassas, Virginia. It further states that CI-10 seeks asylum from Indonesia on account of her race and religion. An Indonesian birth certificate and a declaration of facts are attached to the application as supporting documentation. The birth certificate purports to have been prepared in Jakarta on February 12, 2001, by the Head of Civil Registry in Jakarta. The declaration claims that CI-10 fled Indonesia on August 15, 2002, for the United States after suffering from discrimination and persecution at the hands of Muslim Indonesians. In particular, the declaration alleges that CI-10 suffered discrimination as a Christian Indonesian of Chinese ancestry from her early childhood on. For example, the declaration states that in early August 2002 CI-10's Muslim employer in Indonesia physically attacked her because she was Chinese and attempted to rape and kill her.

152. This application is fraudulent for several reasons. First, I know that CI-10 obtained the application by approaching Gandasaputra and agreeing to pay CIAS \$2,750 for it. Second, CI-10 openly discussed the fraudulent nature of the application with both

Gandasaputra and Parera. Third, CI-10 has never lived at 13105 Canova Drive, Manassas, Virginia. Rather, 13105 Canova Drive, Manassas, Virginia, was the address of a house owned by Gouw (and now by Jenny Gandasaputra). Fourth, the application contains an Indonesian birth certificate under CI-10's alias that was purportedly prepared in Jakarta on February 12, 2001, by the Head of Civil Registry in Jakarta, and later translated into English on August 8, 2003. This birth certificate was not presented to Gandasaputra, Parera, or Gouw by CI-10. Rather, it was concocted by Gandasaputra using CI-10's alias and date of birth for a fee of \$150. CI-10 was in fact born in Indonesia on the date listed in the birth certificate, but of course under her true name, not the alias reflected in the certificate. Fifth, CI-10 did not prepare the declaration attached to her application and did not give Gandasaputra, Parera, or Gouw the information presented in it. On the contrary, the allegations of physical abuse, attempted rape, and attempted murder in the declaration are fictitious and the creation of Gandasaputra, Gouw, or someone acting at their direction. Finally, the asylum application fails to disclose that Gandasaputra prepared the application as required and instead lists no preparer.

153. Jenny Gandasaputra was the principal CIAS agent behind CI-10's fraudulent asylum application. Gandasaputra handled all of the initial negotiations with CI-10, including those concerning price, procedure, and timing. In an early telephone call with CI-10, Gandasaputra openly told CI-10 that she and her associates would create the story for the application and prepare all necessary paperwork, including birth and baptismal certificates. Gandasaputra informed CI-10 that all CI-10 would have to do is pay \$2,750, provide a copy of her passport, and sign a blank application. To that end, she later sent

CI-10 a blank application with directions to sign it in certain places. In a subsequent telephone call, Gandasaputra repeatedly urged CI-10 to study the story in the application CIAS prepared for CI-10. She added that an interpreter would train CI-10 how to answer questions at the asylum interview and could “sharpen” weak answers. She cautioned CI-10, however, that CI-10 could not rely completely on the interpreter. Rather, CI-10 had to “master” her asylum declaration because if the interpreter were caught changing CI-10's answers it could be dangerous for CI-10.

154. Parera also played a central role in the pursuit of CI-10's fraudulent asylum application. In particular, Parera served as CI-10's interpreter. In this role, she both prepared Parera for the asylum interview and interpreted for her at the actual interview. For example, on September 16, 2003, CI-10 met Parera at 6155 Pohick Station, Fairfax Station, Virginia, to practice for her asylum interview. At this meeting, Parera told CI-10 that CI-10 could not bring any documents from CIAS to the asylum interview. Parera said that CI-10 should memorize the 13105 Canova Drive address listed on her application and always refer to it as a house. Parera went on to review CI-10's asylum story with her and to give her several tips on how to answer the questions that would be posed by the asylum officer. These tips, which were designed to appeal to and exploit the sensitivities of the interviewing asylum officer, were as follows. First, if the asylum officer asked if CI-10 had any documents to support her claim, CI-10 should say yes, but inform the officer that the documents were in Indonesia and could be retrieved if the officer needed them. Second, CI-10 should be prepared to answer basic questions about Jesus, his life, and the Bible (which questions Parera then reviewed and answered for CI-10). Third, if the asylum officer asked CI-10 if she had any questions for the officer, CI-

10 should ask the officer if the officer could help CI-10 avoid further persecution in Indonesia. Fourth, CI-10 should beg and plead with the officer to grant her asylum. Finally, CI-10 should pretend that the story in her declaration really happened to her. To that end, she should cry and look sad when telling her story, and should tell the officer that Muslim extremists would kill her if she went back.

155. On September 17, 2003, CI-10 and Parera appeared at the asylum office in Arlington, Virginia, for CI-10's interview. Parera served as CI-10's Indonesian interpreter during the interview. During the interview, Parera repeatedly gave CI-10 hints in Indonesian and told her to give the answers they had practiced the day before. Parera also embellished many of responses CI-10 gave to the asylum officer's questions. For example, when the interpreter asked CI-10 if she had any family or friends who had been harmed in Indonesia, CI-10 stated that she had a female acquaintance who had been harmed. The asylum officer followed up by asking in English, "What happened to her?" CI-10 responded in Indonesian, "I don't know, she was only scolded." Parera, however, translated this answer for the asylum officer in English as, "She got raped."

156. Hans Gouw's known involvement in CI-10's asylum application is more limited. He called CI-10 once and told her the date of her asylum interview and sent her several written notices to the same effect. He also sent CI-10 a receipt for her asylum application payment. This receipt is dated August 7, 2003, and is signed by Gouw. It acknowledges CI-10's payment of \$2,750 to CIAS through postal service money orders. The receipt stated that the fee received was for (1) an asylum fee of \$2,000, (2) a "speed up" fee of \$500, (3) a CIAS membership fee of \$100, and (4) a birth certificate fee of \$150.

Specific Example of Fraud Involving Herlina Suherman, Hanny Kembuan,
Achnita Supomo, and Hans Gouw

157. From on or about July 15, 2003, and continuing through October 21, 2003, Herlina Suherman, Hanny Kembuan, Achnita Supomo, and Hans Gouw knowingly helped CI-11 to apply for asylum by fraud through CIAS. During this time, CI-11 posed as an Indonesian immigrant seeking to work and remain in the United States. CI-11 paid CIAS a total of \$2,250 in fees for Suherman, Kembuan, Supomo, and Gouw's assistance. As a result of CI-11's interaction with Suherman, Kembuan, and Gouw, CIAS filed a fraudulent asylum application for CI-11 on September 29, 2003, at the CIS service center in Texas.

158. The asylum application CIAS filed on CI-11's behalf on September 29, 2003, is signed by CI-11 using an alias. No reference is made in the application to CIAS, Suherman, Kembuan, or Gouw. The application states that CI-11 seeks asylum from Indonesia on account of his race and religion. An Indonesian birth certificate and an unsigned declaration of facts are attached to the application as supporting documentation. The birth certificate purports to have been prepared in Jakarta on February 12, 2001, by the Head of Civil Registry in Jakarta. The declaration claims that CI-11 fled Indonesia in 2001 for the United States after having been attacked by native Muslim Indonesians. In particular, the declaration alleges that CI-11 was attacked by a group of Muslim Indonesians as he was driving home. The men kicked him and yelled at him. One of the men then retrieved a steel pipe and beat him so severely that blood flowed from his ears and nose. According to the declaration, CI-11 then passed out and awoke to find himself

in the hospital. Upon his recovery, CI-11 fled the country for the United States fearing “further persecution and even death” should he return to Indonesia.

159. CI-11's asylum application is fraudulent for several reasons. First, I know that CI-11 obtained the application by paying CIAS \$2,250 to prepare it. Second, CI-11 openly discussed the fraudulent nature of the application with Suherman, Kembuan, Supomo, and Gouw. Third, the application contains an Indonesian birth certificate for CI-11 that was purportedly prepared in Jakarta on February 12, 2001, by the Head of Civil Registry and later translated into English on August 5, 2003. In fact, this birth certificate was fabricated by Gouw or his associates for a fee of \$150. Fourth, CI-11 did not prepare the declaration attached to his application and did not present the information in it to Suherman, Kembuan, Supomo, or Gouw. On the contrary, the assault on CI-11 related in the declaration is fictitious and the creation of Suherman, Kembuan, Supomo, Gouw, or someone acting at their direction. Finally, the asylum application fails to disclose that Suherman, Kembuan, Supomo, Gouw, or someone acting at their direction prepared the application.

160. CI-11's asylum application actually came about as follows. On or about July 15, 2003, C-11 used an alias and called Suherman. Suherman told CI-11 that she was in a meeting. As a result, CI-11 agreed to call Suherman later. On July 16, 2003, CI-11 again called Suherman. CI-11 told Suherman that he was in the country illegally and wanted assistance with his immigration status. Suherman told CI-11 that his only option was asylum, but that the chances of success were poor. According to Suherman, “[I]mmigration [authorities] sense that there are many who are lying, they just apply for the sake of applying only. And that is true, many are doing that merely to buy time in

order to stay here.” Because an asylum applicant could delay deportation “for three, four to five years,” however, Suherman nonetheless recommended asylum to CI-11 and directed him to her boss “Hans” in Virginia whom she described as an “expert” who had “done asylum applications for more than seven hundred people.” Suherman told CI-11 that because she was based in Michigan and was the “representative of CIAS for the Mid West region,” it would be easier if she called Gouw and arranged for CI-11 to pursue his asylum case with Gouw directly. CI-11 agreed.

161. On July 18, 2003, CI-11 called Suherman again and told her that he would rather deal with Gouw through her. Suherman agreed to remain involved, explaining that she and Gouw worked together and that Gouw was her boss. Suherman asked CI-11 for a mailing address and told him there were some forms that he would need to complete. CI-11 asked how the asylum story for these forms would be created and informed Suherman that he had not suffered any bad experiences in Indonesia. Suherman replied that, if CI-11 had no asylum story, they [CIAS] would make one for him. CI-11 then asked Suherman if Gouw himself would create the story. Suherman replied, “Eeh, not him specifically, but [it] looks like he has his crew. I, I told you, I usually if people do not have a story, I send the form, send it back to him, my boss. Later he will take care of it all.” When CI-11 added that he did not have a birth certificate, Suherman stated, “Eeh, they can make that, too.” Suherman closed the conversation by telling CI-11 to call Gouw and tell him that Suherman had told CI-11 to call. Suherman told CI-11 that she had already called Gouw about CI-11's case, but said Gouw might have forgotten because he has thousands of clients.

162. Right after calling Suherman, CI-11 called Gouw at CIAS in Virginia. Gouw was not available, so CI-11 spoke with Hanny Kembuan. CI-11 explained to Kembuan that he had no status, and Kembuan stated that asylum was “the only way out.” Kembuan told CI-11 that he would send CI-11 some forms to complete, some of which needed only a signature and some of which needed to be completed fully. Kembuan added that he would need a copy of CI-11's passport, four passport photographs of CI-11, a copy of CI-11's birth certificate, and a copy of CI-11's baptismal certificate. When CI-11 replied that he did not have a copy of his birth certificate or his baptismal certificate, Kembuan told CI-11 that CIAS could make birth and baptismal certificates for a fee of \$150 per certificate. Kembuan closed the conversation by informing CI-11 that the base fee for an asylum application was \$2,000, plus a \$100 CIAS membership fee, plus the cost of any needed certificates. Kembuan told CI-11 that he should pay in money orders and that the \$2,000 base fee included the cost of preparing an asylum declaration. When CI-11 asked how the declaration would be created, Kembuan stated that CIAS could make it for CI-11 if he needed help.

163. That same day, July 18, 2003, Kembuan sent CI-11 a priority mail package from the post office in Fairfax Station, Virginia. This package contained Kembuan's CIAS business card, a CIAS asylum questionnaire, an application for asylum, and an application for work authorization. On August 1, 2003, CI-11 mailed the questionnaire, the asylum application, the work authorization application, and \$2,250 in Postal Service money orders to Kembuan at CIAS's office at 6155 Pohick Station Drive, Fairfax Station, Virginia. CI-11 signed the questionnaire, but left blank the section requesting information about any instances of discrimination or persecution that CI-11 may have

suffered in Indonesia. He also signed, but did not otherwise complete, the applications for asylum and work authorization.

164. On July 24, 2003, CI-11 called CIAS to discuss the status of his application. Kembuan was not there at the time, but Gouw took the call. CI-11 told Gouw that he had been referred to Gouw by Suherman and had been working with Kembuan because Gouw was unavailable when CI-11 first called CIAS. Gouw stated that working with Kembuan was fine as he would review all forms that came in: “Everything that arrives ultimately has to pass my desk, yea. . . . I check it.” Gouw further noted that both Suherman and Kembuan worked for him. Gouw stated that Suherman was his representative and that Kembuan “is only a legal assistant here [at CIAS], yea; there are many. They number in the teens here.”

165. On August 5, 2003, Gouw mailed to CI-11 a receipt for the \$2,250 in money orders that CI-11 sent to Kembuan on August 1, 2003. The receipt is on CIAS letterhead and bears CI-11's alias and Hans Gouw's signature. The receipt records CI-11's payment as follows: a \$2,000 asylum fee, a \$100 CIAS membership fee; and \$150 birth certificate fee.

166. On August 11, 2003, CI-11 called Kembuan. Kembuan told CI-11 he still needed a copy of CI-11's passport, which CI-11 agreed to provide. When CI-11 asked Kembuan if his birth certificate had been made, Kembuan replied “[Y]es, that has been made for you.” When CI-11 asked about the status of his asylum story, Kembuan stated that he already had created it for CI-11 and all CI-11 needed to do was accept it.

167. On October 10, 2003, Kembuan mailed CI-11 a notice from the asylum office. This notice informed CI-11 that his asylum interview was scheduled for October

21, 2003, at the asylum office in Arlington, Virginia. On October 15, 2003, CI-11 called Kembuan and agreed to meet with Kembuan on October 20, 2003, to prepare for the asylum interview.

168. On October 20, 2003, CI-11 met Kembuan at the CIAS office at 6155 Pohick Station Drive, Fairfax Station, Virginia. During this meeting, Kembuan informed CI-11 that an interpreter, Achnita, would meet with CI-11 later in the evening to brief CI-11 about the asylum interview and to tell CI-11 “how to answer” questions. Kembuan told CI-11 that Achnita was “accustomed to facing asylum officers” because she had “faced them more than thirty times.” Kembuan warned CI-11 that he should not look at Achnita “too much” during the interview or “it would appear that there is — there is cooperation.” Kembuan told CI-11 that it should appear that the “interpreter’s duty is only translating.” However, Kembuan advised CI-11 that Achnita “knows the case” and had “studied,” such that if CI-11 made a mistake in answering a question, Achnita “[could] help.” Kembuan further advised CI-11 that it would be easier to succeed before the asylum officer than before an immigration judge and that, during the asylum interview, CI-11 could “do a little acting” and should “do [his] best just to cry.” Kembuan alerted CI-11 that a question about religion could arise during the asylum interview. CI-11 left the meeting with the understanding that he would return later in the evening for a full briefing with Achnita.

169. Later that same day, CI-11 met with Achnita Supomo as planned. During the meeting, Supomo told CI-11 how to answer questions about the inaccurate address listed on CI-11's asylum application. Supomo mentioned that a single asylum officer could possibly interview two Indonesians in one day whose applications reflected the

same false address. Supomo wanted to devise an explanation that could allay an asylum officer's possible suspicions. Supomo reviewed the asylum application with CI-11 and corrected CI-11 when he made an error in reciting the claim. For instance, Supomo reminded CI-11 that, according to the application, CI-11 had been attacked by two people, not a group of people as CI-11 had remembered. Supomo told CI-11 how to respond if the asylum officer asked for more details than were specified in the application. For example, if the officer asked CI-11 how long he was hospitalized, Supomo told CI-11, "just say that [you] stayed at the hospital, two days, make it three days . . . three days yea." Ultimately, Supomo settled on two days. Supomo emphasized that CI-11 had to "really memorize" the story with special attention to the "the sequence of the incidents." Supomo also warned CI-11 to hide his knowledge of English from the asylum officer.

170. The following morning, on October 21, 2003, CI-11 and Supomo met at the asylum office in Arlington, Virginia, for CI-11's interview. Supomo served as CI-11's Indonesian interpreter during the interview. During the interview, Supomo did not translate CI-11's responses accurately. For instance, although CI-11 told the asylum officer that he had lived at a certain address for one year, Supomo told the officer that CI-11 had lived at the address for four years. In addition, when asked why he came to the United States, CI-11 replied that he came to vacation. Supomo, however, conveyed to the asylum officer that CI-11 had come to the United States due to trauma in Indonesia.

Specific Example of Fraud Involving Hans Gouw, Johnson Aliffin, and Ratna Hartanto

171. CW-1 and CW-2 are Indonesian immigrants who have lived in California since arriving in the United States in October 1999 and January 2000, respectively. CW-

1 is a man; CW-2 is a woman. The two are engaged and live together. Both are in the United States illegally, having overstayed their tourist visas. In March 2003, CW-1 and CW-2 came forward to federal immigration officials in California and disclosed that their then pending asylum claim was fraudulent and had been prepared by Hans Gouw and his associates at CIAS in Virginia. Since that time, CW-1 and CW-2 have cooperated with me and aided my investigation of the targets in this case.

172. I have reviewed CW-1 and CW-2's asylum application and related immigration records and determined the following. On or about March 1, 2001, CIAS filed a joint asylum application on behalf of CW-1 and CW-2, at the INS Service Center in Texas. This application lists CW-2 as the named applicant and bears her signature; CW-1 is included as a dependant spouse. The application states that "Hans L.H. Gouw" of 6155 Pohick Station Drive, Fairfax Station, Virginia, prepared the application. The central claim of the application is that CW-2 suffered severe mistreatment at the hands of Muslim Indonesians based on her Chinese ancestry and adherence to Christianity. The application also states that CW-1 and CW-2 were married in 1998 and were living at 10079 Chestnut Wood Lane, Burke, Virginia, at the time the application was filed.

173. Attached to and included in the application are numerous documents designed to support CW-1 and CW-2's claim for asylum, including an Indonesian marriage certificate and an unsigned declaration of facts ostensibly written by CW-2. The marriage certificate states that CW-1 and CW-2 were married in Jakarta on September 4, 1998. The certificate is signed by the "Head of the Civil Registry" in Jakarta, Indonesia, and purports to reflect the records from "the register of marriages" in Jakarta. The declaration states that CW-2 fled Indonesia in 2000 after suffering sustained

persecution at the hands of Indonesian Muslims. In particular, the declaration claims that (1) CW-2 was the victim of a violent robbery and attempted rape in 1992 at the hands of Muslim men; (2) that CW-2 and CW-1 were attacked by a Muslim mob in 1998, which mob terrorized CW-2 and beat CW-1 so badly he had to spend weeks in the hospital; and (3) that CW-1 and CW-2 were attacked by another Muslim mob during a Christian prayer meeting later in 1998, which mob cudgelled CW-1 to the point that he went into a coma and had to spend weeks in a hospital and a mental institution.

174. I know CW-1 and CW-2's asylum application to be a fraud for several reasons. First, CW-1 and CW-2 are not and have never been married. Second, CW-1 and CW-2 did not live at 10079 Chestnut Wood Lane, Burke, Virginia, at the time CIAS filed their asylum application. Indeed, CW-1 and CW-2 have lived in California since they arrived in the United States. Third, I have interviewed both CW-1 and CW-2 and they told me that the statements in their application concerning their marriage, Virginia address, and persecution in Indonesia are all statements concocted by Hans Gouw and his associates at CIAS.

175. During their interviews, CW-1 and CW-2 told me they first learned of CIAS through an advertisement in an Indonesian magazine published in California. Based on the advertisement, they called CIAS in the spring of 2000 to seek help with their immigration status. During this first call, CW-1 spoke to Megawaty Gandasaputra who told CW-1 that CW-1 and CW-2 should come to Virginia and pursue an asylum claim with CIAS's assistance. Gandasaputra told CW-1 that Virginia was a better place to file for asylum because the chances of being granted asylum were better in Virginia than California. In July 2000, CW-1 and CW-2 traveled to Virginia to go to CIAS. Nany

Kumala met them at the airport and took them to 10079 Chestnut Wood Lane, Burke, Virginia, a house which was the then headquarters of CIAS. CW-1 and CW-2 spent several nights in the house, along with several other Indonesian immigrants who CW-1 and CW-2 understood were other CIAS clients.

176. While at CIAS, CW-1 and CW-2 met Hans Gouw and formally agreed to pursue an asylum claim through him in return for a base fee of \$2,500 and additional fees for lodging in Virginia, membership in CIAS, Virginia identification cards and driver's licenses, and transportation to and from the airport. Gouw told CW-1 and CW-2 that the CW-2 should be the lead applicant because immigration authorities were more sympathetic to women. He also told CW-1 and CW-2 that they should file as husband and wife even though they told Gouw they were not married. To this end, Gouw told CW-1 and CW-2 that he would create a marriage certificate for them in return for a fee of \$300. Gouw did not ask them to describe their experience in Indonesia; rather, he told CW-1 and CW-2 that he would prepare their asylum story for them and that they would later have to study it before the interview at the asylum office. CW-1 and CW-2 paid Gouw half of the asylum fee and another \$850 in additional fees for his efforts (including \$300 for the false marriage certificate), with the remainder being due at the time of their asylum interview at the Asylum office. Before returning to California, Nany Kumala took CW-1 and CW-2 to the Virginia DMV and helped them apply for and obtain Virginia learner's permits and identification cards by falsely claiming the Chestnut Wood Lane address to be their true address.

177. In March 2001, CIAS sent CW-1 and CW-2 a copy the asylum application Hans Gouw had prepared and filed on their behalf and informed CW-1 and CW-2 that

their interview before the Asylum office was scheduled on April 4, 2001, at the asylum office in Arlington, Virginia. When CW-1 and CW-2 read the application, they were troubled by the falsehoods and exaggerations in the declaration that had been prepared for CW-2. CW-1 called CIAS about the declaration and spoke to Johnson Aliffin, one of Gouw's CIAS employees. CW-1 told Aliffin that he was concerned about the inconsistencies and false statements in the declaration. Aliffin told CW-1 not to worry and assured him that changes could be made to the declaration prior to the interview if necessary.

178. On March 31, 2001, CW-1 and CW-2 flew to Virginia to prepare for their asylum interview and again stayed at CIAS. Hans Gouw met with both CW-1 and CW-2 and instructed CW-2 how to prepare for the interview. Gouw told CW-2 to memorize her declaration and advised her to seek the sympathy of the asylum officer conducting the interview by crying at opportune moments. CW-1 and CW-2 then paid Gouw the remaining \$1,250 asylum fee and an additional \$300 in miscellaneous fees, including approximately \$125 in fees for Virginia driver's licenses CW-1 and CW-2 obtained on April 2, 2004, while waiting for their asylum interview.

179. On April 4, 2001, the day of the asylum interview, Ratna Hartanto took CW-1 and CW-2 to the asylum office in Arlington, Virginia. According to CW-2, Hartanto knew CW-2's declaration was false because CW-2 told her so before the interview. Hartanto told CW-2 not to worry about it and to memorize it as best she could. The interview at the asylum office was conducted by an asylum officer and included CW-2 as the applicant and Hartanto as the interpreter. The purpose of the interview was to review CW-2's asylum application, declaration, and documents

supporting her claim. Because CW-1 was not the lead applicant, he was not interviewed and remained in the lobby. To demonstrate her residence in Virginia, CW-2 presented the asylum officer with a rental agreement several employees at CIAS created for her that falsely stated that CW-2 was renting 10079 Chestnut Wood Lane, Burke, Virginia, for \$250 a month. During the interview, Hartanto translated for both the asylum officer (who did not speak Indonesian) and CW-2 (whose English was poor). According to CW-2, however, Hartanto intentionally mis-translated CW-2's answers throughout the interview, particularly when CW-2 could not remember the details of the declaration or the asylum officer called for a more detailed answer to a given question. Indeed, after the interview, Hartanto told CW-2 that she informed the asylum officer that CW-2 had stated that three men were killed during the attacks described in CW-2's declaration when in fact CW-2 had said no such thing. Once the interview was finished, CW-1 and CW-2 returned to California.

180. I have reviewed CW-2's alien file and confirmed that Ratna Hartanto did in fact serve as CW-2's interpreter on April 4, 2001. CW-2's alien file contains a record of the asylum interview bearing Hartanto's signature as the interpreter. In addition, a copy of Hartanto's Virginia driver's license is attached.

181. On April 16, 2001, CW-1 and CW-2 returned to Virginia to receive the asylum officer's decision. Hartanto took CW-1 and CW-2 back to the asylum office in Arlington, Virginia, where CW-1 and CW-2 both met with the asylum officer. At this meeting, the asylum officer denied CW-1 and CW-2's application and referred them both for deportation proceedings before an immigration judge. Before returning to California,

CW-1 and CW-2 confronted Gouw about the asylum officer's decision. Gouw told them not to worry and that they would very likely prevail before the immigration judge.

182. On May 8, 2001, CW-1 and CW-2 returned to Virginia for their initial deportation hearing. On this trip, they stayed at Hartanto's house. Johnson Aliffin took CW-1 and CW-2 to the hearing at the immigration court in Arlington, Virginia. On the way, he told CW-1 and CW-2 to continue to pursue their original asylum claim and not to worry. At the immigration court, Aliffin introduced CW-1 and CW-2 to an attorney CIAS had arranged to take their case. This attorney handled their initial appearance before the immigration judge, but did not seem aware of the underlying circumstances of CW-1 and CW-2's asylum claim.

183. CW-1 and CW-2's later obtained a new attorney and had their deportation case transferred to the immigration court in San Francisco, California. Their new attorney reviewed the asylum officer's decision and began to ask CW-1 and CW-2 for documentary evidence to corroborate the statements CW-2 had made to the asylum officer during her asylum interview. In particular, the attorney asked for evidence to support the statement that Hartanto had made for CW-2 that several people were killed as a result of the attacks described in CW-2's declaration. CW-1 contacted Gouw about this request, and Gouw produced three false "death certificates" for CW-1 and CW-2 to use. Like the marriage certificate Gouw produced for CW-1 and CW-2, these death certificates were purportedly issued by the "Head of Civil Registry" in Jakarta. In the end, CW-1 and CW-2 decided to come forward to authorities, and these certificates were never used to pursue CW-1 and CW-2's asylum claim before an immigration judge.

Asylum Fraud Committed by Megawaty Gandasaputra Through AAPS

184. CI-6 and CI-7 are husband and wife. Between May 7, 2003, and August 13, 2003, Megawaty Gandasaputra knowingly helped CI-6 and CI-7 to apply for asylum by fraud through AAPS. During this time, CI-6 and CI-7 posed as Indonesian immigrants seeking a green card to remain in the United States. CI-6 handled the bulk of the negotiations with Gandasaputra, but for purposes of the application CI-7 was the lead applicant. CI-6 was listed a dependant beneficiary. CI-6 and CI-7 paid AAPS a total of \$6,300 in fees for the asylum application. As a result of CI-6's and CI-7's interaction with Gandasaputra, Gandasaputra filed a fraudulent asylum application for CI-7 through the U.S. Postal Service on July 18, 2003, at the CIS service center in Texas. The mailing envelope for the application states that the envelope was mailed by an attorney in Bethesda, Maryland, but reflects a Fairfax Station, Virginia, postal stamp.

185. The asylum application Gandasaputra filed on CI-7's behalf on July 18, 2003, lists CI-7 as the applicant and CI-6 as a dependant beneficiary. An attorney in Bethesda, Maryland, signed the application as the preparer. The application states that CI-7 seeks both asylum from Indonesia on account of her religion and membership in a particular social group and protection pursuant to the Convention Against Torture. The application bears CI-7's signature and includes CI-7's purported birth certificate, a purported letter from CI-7's mother in Indonesia, and CI-7's purported declaration. The birth certificate purports to have been prepared in Batang, Indonesia, on April 20, 1966, by an official of the Civil Registry. The letter appears to be a personal certification by CI-7's mother that all of the events outlined in CI-7's application and declaration are true. The declaration claims that CI-7 fled Indonesia on November 21, 1993, for the United

States after suffering from persecution at the hands of Muslim Indonesians. In particular, the declaration alleges that CI-7 suffered repeated physical assaults by Muslim men because she was Taoist. According to the declaration, a group of Muslim men targeted CI-7 for extortion from December 1992 to September 1993. During this time, the men repeatedly robbed her, assaulted her, and threatened to kill her because she was not Muslim. Eventually, they sent her an anonymous letter stating that if she did not leave her home, her life could not be guaranteed. This letter intimidated her to the point that she then fled Indonesia for the United States.

186. This application is fraudulent for several reasons. First, I know that CI-6 obtained the application for CI-7 by approaching Gandasaputra and agreeing to pay AAPS \$6,350 for it. Second, CI-6 and CI-7 openly discussed the fraudulent nature of the application with Gandasaputra. Third, the Indonesian birth certificate and the letter from CI-7's mother were fabricated by Gandasaputra. Fourth, neither CI-6 nor CI-7 prepared the declaration attached to CI-7's application and did not give Gandasaputra the information presented in it. On the contrary, the allegations in the declaration of extortion, physical assault, and attempted murder, and the claim that CI-7 is Taoist are fictitious. Finally, although an attorney declares in the application that he prepared the application at CI-7's request and personally witnessed her signature on the application, CI-7 did not meet this attorney until after the application had been completed and filed with the asylum office.

187. CI-7's fraudulent asylum application actually came about as follows. On May 7, 2003, CI-6 telephoned Megawaty Gandasaputra at AAPS and inquired about applying for asylum. CI-6 and his wife, CI-7, had previously sought Gandasaputra's

assistance with a labor certification application, but CI-6 now told Gandasaputra he wanted to pursue the fastest means of obtaining a green card. After some discussion, CI-6 decided to switch to an asylum application and agreed to pay Gandasaputra a fee of \$5,900 for the application: \$4,150 in money orders plus \$1,750 he had already paid AAPS for the labor certification application.

188. On May 12, 2003, CI-6 called the AAPS again to discuss his asylum application with Gandasaputra. At first, CI-6 spoke to one of Gandasaputra's subordinate employees. When this employee recognized CI-6's case, CI-6 told the employee he was Muslim. The employee replied, "[M]aybe you can say you are Taoism or you are Kejawen" (two different religions). Shortly thereafter, Gandasaputra came on the line. Gandasaputra told CI-6 that his wife, CI-7, should be the lead asylum applicant instead of CI-6. Gandasaputra explained, "It's like this: according to our lawyer, a woman is better as an applicant, right? A woman will be pitied more, right? So [CI-7] is the applicant and you [are] the dependant." CI-6 then informed Gandasaputra that he was Muslim. Gandasaputra also encouraged CI-6 to pretend to be Taoist or Kejawen. Gandasaputra stated that as long as his religion was not included in his passport, CI-6 had a "right not to give voluntary information." Gandasaputra advised CI-6 against revealing that he is a Muslim and stated that there was "no need" to share his true religion with immigration officials. Gandasaputra also stated that she needed CI-6 to provide a birth certificate for CI-7, a diploma for CI-7, and a "witness letter" from Indonesia addressed to CI-7 in the United States. Gandasaputra clarified that she actually didn't need the letter, but rather the mailed envelope.

189. On May 19, 2003, CI-6 met with Gandasaputra at Gandasaputra's residence and the then office of AAPS at 6003 Captain Marr Court, Fairfax Station, Virginia. During this meeting, Gandasaputra offered to help CI-6 produce a diploma and birth certificate for CI-7 if necessary. She also went over CI-6 and CI-7's basic background information and again suggested that CI-7 claim to be Kejawen or Taoist. Gandasaputra also instructed CI-6 to come up with events that happened to CI-7 for the asylum claim, and they discussed the possibility of CI-7 being accosted on account of her Chinese appearance or being held up on a public bus in Jakarta. At the conclusion of the meeting, CI-6 paid Gandasaputra \$4,150 in U.S. Postal Service money orders for which Gandasaputra gave CI-6 a signed receipt.

190. On June 9, 2003, CI-6 again met with Gandasaputra at 6003 Captain Marr Court, Fairfax Station, Virginia. Gandasaputra began the meeting by telling CI-6 that she and her husband were moving AAPS's office to the Spring Mall Office Building at 6551 Loisdale Court, Suite 115, in Springfield, Virginia. Gandasaputra then gave CI-6 CI-7's completed asylum declaration and told CI-6 to have CI-7 sign it and return it to her. She also told CI-6 to make a copy of the declaration so that he and CI-7 could study it to prepare for the asylum interview. Gandasaputra gave CI-6 a copy of the birth certificate and diploma she had created for CI-7's application. CI-6 in turn paid Gandasaputra \$400 in cash for the documents for which Gandasaputra gave him a signed receipt. On or about June 10, 2003, CI-7 signed the asylum declaration and CI-6 mailed it back to Gandasaputra.

191. On July 30, 2003, Gandasaputra faxed CI-6 a notice from the asylum office. This notice informed CI-7 that her asylum interview was scheduled for August 13, 2003,

at the asylum office in Arlington, Virginia. A few days later, Gandasaputra called CI-7, confirmed the date of the interview, and instructed CI-7 to meet her on August 12, 2003, to prepare for the interview.

192. On August 12, 2003, CI-6 and CI-7 met with Gandasaputra at AAPS's office at 6551 Loisdale Court, Suite 115, Springfield, Virginia, to practice for the asylum interview. During the practice session, Gandasaputra coached CI-6 and CI-7 how to act and speak during the interview. Gandasaputra began by noting that she had deliberately chosen CI-7 as the lead applicant, "because [a] woman creates more pity. She reminded CI-7 not to look at the interpreter, but rather, the asylum officer: "Remember you talk to him, to this white man, or this officer, right. We pay attention, we try to gain his sympathy, so that he sympathizes with you. You'll certainly pass then." Gandasaputra went on to urge CI-7 to cry at the right moments: "Usually it is good if a woman cries when she is telling a story."

193. When it came time to review CI-7's asylum story, Gandasaputra repeatedly reminded both CI-6 and CI-7 to memorize the story. Gandasaputra urged CI-7 to pay particular attention to her claim to be Tao: "Your religion is Taoism. Taoism, we call it faith in the one and only God. You believe in the existence of God. Taoism is not communism. Somebody [another client] recently passed using Taoism. . . . But if Christian you will be finished. He [the asylum officer] is good at Christianity; those whites are Christian, you'll be finished. That's why we submitted Taoism, so that if you are being asked, at a minimum it is Taoism not Christianity. You're dead if it is Christian. Done." Gandasaputra went on to coach CI-7 about what CI-7 should say if the asylum officer asked her why she didn't want to go home to Indonesia. Gandasaputra

told CI-7 to tell the officer that because she was Tao and not Muslim, she was traumatized by the prospect of returning to Indonesia. Gandaspautra further told CI-7 to tell the officer that she feared she or her two daughters would be raped by Muslims if they were forced to return. Gandasaputra advised CI-7 to emphasize tearfully that her daughters were “small, beautiful, white.” She also advised CI-7 to tell the officer that no one in Indonesia could help CI-6 and CI-7 if they were to return and that CI-6 and CI-7 had not applied for asylum in Malaysia or Australia because Malaysia was Muslim, Australia was anti-Asian, and the United States was the only country that gave asylum to minorities.

194. On August 13, 2003, CI-6 and CI-7 went to the Arlington asylum office for their asylum interview. Once there, CI-6 and CI-7 were met by an interpreter and immigration attorney arranged by Gandasaputra. The interpreter and attorney sat with CI-7 as she was interviewed by the asylum officer.

Asylum Fraud Committed by Nany Kumala Through KN

195. From on or about July 23, 2003, continuing through the present, Nany Kumala has knowingly helped CI-2, acting exclusively through CI-8, to apply for asylum by fraud through KN. During this time, CI-8 and CI-2 posed as Indonesian immigrants seeking a green card to remain in the United States and used aliases. CI-8 paid Nany Kumala a total of \$2,000 in fees for CI-2's asylum application.

196. CI-8's interaction with Kumala happened as follows. On July 23, 2003, CI-8 called Nany Kumala and asked her if she would prepare an asylum application for his friend, CI-2. (CI-8 was simultaneously pursuing an application for labor certification through Kumala.) Kumala said she would prepare an asylum application for CI-2 for a

fee of \$1,950, which fee would include Kumala's fabrication of a birth certificate for CI-2. Kumala told CI-8 that she would need a copy of CI-2's passport, some photographs of CI-2, and a down payment to get started on CI-2's asylum application. On August 18, 2003, CI-8 sent Kumala a U.S. Postal Service money order for \$900 by mail on CI-2's behalf. With this payment, he included a copy of a passport bearing CI-2's photograph and CI-2's alias, as well as photographs of CI-2.

197. On August 21, 2003, Kumala sent CI-8 a letter and four photographs of CI-2. In the letter, Kumala acknowledged receiving CI-2's down payment of \$900 and his documents. Kumala instructed CI-2 to pay the remainder of the \$1,950 fee by the time of the asylum interview and to send her new photographs because she didn't like the appearance of the four being returned.

198. On November 18, 2003, Kumala sent CI-8 a letter seeking copies of his and CI-2's U.S. visas, which CI-8 did not have. She also enclosed a receipt for the recent payment CI-8 had made on CI-2's behalf. On April 8, 2004, CI-8 paid Kumala \$1,000 at her request so that she and an attorney could help CI-8 and CI-2 with the missing visas. Kumala subsequently deposited the \$1,000 and sent CI-8 a receipt. In a letter dated May 1, 2004, Kumala informed CI-8 that CI-2's photographs were improperly taken and asked CI-8 to send her more photographs, which he did.

199. On October 13, 2004, CI-8 went to Kumala's house at 6308 Torrence Street to discuss in person the status of CI-2's asylum application and CI-8's labor certification application. Once inside Kumala's house, CI-8 asked Kumala what the status of the two applications was and why it had taken so long to process them. Kumala assured CI-8 that the applications had been filed and told him to be patient. When CI-8 pressed her for

receipts to show that both applications had been filed, Kumala said that she had no receipt to give CI-2. Instead, she said the only receipt that would come would be a notification from the asylum office concerning the date of CI-2's asylum interview. Kumala went on to say that CI-8 had misunderstood her concerning his labor certification application. Kumala stated that she had never agreed to file a labor certification application, only an application for a working permit. She was equally vague, however, about the status of this application. Kumala did say that once CI-2's asylum application was scheduled for an interview, CI-2 would need to come to her house to practice for the interview beforehand. She added that CI-2 could stay at her house for purposes of this pre-interview practice. CI-8 closed the meeting by asking Kumala if she had received all the money he had sent her for both CI-2's asylum case and his case. Kumala replied that she had and again told CI-8 just to be patient.

Specific Example of Fraud Involving Silvy Karageorge through CIPCS

200. Between May 13, 2003, and November 15, 2004, Silvy Karageorge knowingly helped CI-11 to apply for asylum by fraud through CIPCS. During this time, CI-11 posed as an Indonesian immigrant seeking a green card to remain in the United States. CI-11 paid Karageorge a total of \$3,100 in fees for an asylum application. As a result of CI-11's interaction with Karageorge, Karageorge filed a fraudulent asylum application for CI-11 on September 19, 2003 at the CIS service center in Texas, which application remains pending.

201. The asylum application Karageorge filed on CI-11's behalf on September 29, 2003, lists an A.K. as the alleged preparer and provides A.K.'s alleged Washington D.C. address and telephone number. The application states that CI-11 seeks asylum from

Indonesia under the Torture Convention and on account of his religion. The application bears CI-11's signature and includes an Indonesian police report, an Indonesian doctor's note, and CI-11's purported declaration. The police report ostensibly document that CI-11 was assaulted in May 2001 by five unidentified males at a hospital in East Jakarta. The doctor's note claims that CI-11 suffered face, head, body, and leg wounds from this same May 2001 assault that required three days of rest. The declaration claims that CI-11 fled Indonesia on May 17, 2001, for the United States after suffering from persecution at the hands of Muslim Indonesians. In particular, the declaration alleges that CI-11 suffered six separate assaults at the hands of Muslim men because of his adherence to Christianity: (1) an attempted drowning at a public pool in June 1996; (2) a beating in public by anti-Chinese rioters in May 1998; (3) a beating after praying for the infirm at a local hospital in September 2000; (4) a beating at another hospital after praying for an elderly woman in January 2001; (5) a beating in public in February 2001; and (6) a final beating by five men at a hospital in East Jakarta in May 2001. According to the declaration, several of these beatings were so severe that CI-11 bled from the nose and mouth or lost consciousness.

202. This application is fraudulent for several reasons. First, I know that CI-11 obtained the application by paying Karageorge \$3,100 to prepare it. Second, CI-11 openly discussed the fraudulent nature of the application with Karageorge. Third, the Indonesian police note and doctor's note included in the application were fabricated by Karageorge. Fourth, CI-11 did not prepare the declaration attached to the application, and the information in the declaration is not based on CI-11's actual experience in

Indonesia. On the contrary, the allegations in the declaration of an attempted drowning and repeated assaults are wholly fictitious and were concocted by Karageorge. Finally, although an A.K. declares in the application that she prepared the application at CI-11's request and personally witnessed his signature on the application, CI-11 has never met or spoken to an A.K. In fact, I can find no official record of an A.K. at the Washington D.C. address listed in the application, and the telephone records show that the number listed as A.K.'s telephone number has never been held by a person bearing that name.

203. CI-11's fraudulent asylum application actually came about as follows. On May 13, 2003, CI-11 called Silvy Karageorge to seek her assistance with an asylum claim. CI-11 had previously approached Karageorge for similar assistance, but did not follow through when it became clear that Karageorge was preparing to engage in fraud on CI-11's behalf. During the May 13, 2003, call, Karageorge agreed to help CI-11 for a base fee of \$2,500 and told CI-11 they would need to meet to "make [a] story" for the application. Karageorge also told CI-11 that CI-11 would need a doctor's certificate, a police certificate, and a witness affidavit to corroborate the story. When CI-11 stated that he didn't have a doctor's certificate, Karageorge replied "You must make one, make one that you were tortured, beaten, assaulted, thus, uh, tortured. Have it report that the doctor prescribed rest for five days because of wounds." Karageorge advised CI-11 that if CI-11 could not arrange to get a police certificate or doctor's certificate himself, Karageorge could arrange to have an individual in New Jersey make them for \$300 per certificate. Karageorge also told CI-11 that he would have to come to her house "to draw up the story."

204. In a subsequent call on May 30, 2003, Karageorge clarified that the \$600 fee for the police certificate and doctor's certificate was in addition to the \$2,500 fee for the false asylum application—bringing CI-11's total fee to \$3,100. She added that CI-11 would have to pay her a down payment if CI-11 was serious about pursuing an application. CI-11 agreed to pay the down payment and to use Karageorge's services to obtain the police certificate and doctor's certificate.

205. On June 11, 2003, Karageorge and CI-11 again spoke by telephone. Karageorge stated that she needed to meet with CI-11 to prepare the asylum application and gave him instructions on what to bring to the meeting. Karageorge explained that the preparation of the application could require approximately eight hours and that the training CI-11 needed could require an additional ten hours. Karageorge again agreed to provide CI-11 with a false police certificate and doctor's certificate for \$300 per certificate and indicated that her share of each fee was \$60. Karageorge and CI-11 arranged to meet on June 17, 2003.

206. On June 17, 2003, Karageorge and CI-11 met at the law firm in which Karageorge maintains an office. This law firm is located in Falls Church, Virginia. Karageorge's office is the last office to the rear of the firm. Karageorge began the meeting by inquiring of CI-11's background and suggesting that CI-11's asylum claim center around religious persecution at the hands of Muslims. Shortly after the meeting began, CI-11 paid Karageorge \$3,100 in U.S. Postal Service money orders. When Karageorge realized that this included \$600 for the police and doctor's certificates, Karageorge called someone and left a message stating that she needed "to arrange letters to Indonesia, police and doctor." After Karageorge made this call, she told CI-11 that she

was uncomfortable discussing a “false story” in the law firm and suggested that CI-11 and she go to a nearby Dunkin Donuts. Karageorge stated “Problem is I am not comfortable [in the office]. . . asylum involves lying,” adding “Why do I ask people to come to my home for matters pertaining to asylum? . . . Because it is a lie, do you understand?”

207. Once at the Dunkin Donuts, Karageorge began to fabricate an asylum story for CI-11 to use in his application. Karageorge started the discussion by telling CI-11 “[Y]ou don’t have to write anything; you listen to what I say, because I am going to tell you the story. I will give you a copy. You are going to study that, but we are [now] going to process our story first.” Karageorge then went on to discuss specific “events” that could be alleged in the application to demonstrate that CI-11 was the victim of severe persecution due to his belief in Christianity. In particular, Karageorge suggested CI-11 concoct false accounts of (1) being attacked and nearly drowned by Muslims at a pool, (2) being attacked by Muslims after ministering to elderly Christians at a hospital, (3) being beaten during a riot because he wore a cross and looked Chinese, and (4) being attacked while distributing food and pamphlets with a friend. Karageorge specifically stopped at four events because she felt that CI-11 would not be able to “study” more.

208. On June 27, June 30, and July 1, 2003, Karageorge and CI-11 conversed by telephone several times. During these calls, Karageorge told CI-11 that the asylum story was nearly finished and that it was time for CI-11 to sign the asylum application and study the story within it. Karageorge added that her lawyer was scrutinizing the story and making some revisions. On July 17, 2003, Karageorge sent CI-11 a draft of the asylum story and a blank asylum application by mail from the post office in Woodbridge,

Virginia. Karageorge included instructions directing CI-11 to review the story, to make any desired revisions, and to rewrite it in his own hand. Karageorge further instructed CI-11 to complete the application. The draft asylum story Karageorge sent CI-11 presented four “tragic events” as the basis of CI-11's claim. In the first event, Muslims attempted to drown CI-11 at a pool because he was a Christian. In the second, Muslims attacked CI-11 during an anti-Chinese riot in Jakarta. In the third, Muslims assaulted CI-11 after CI-11 and a friend prayed for patients at a local hospital. In the fourth, Muslims robbed and beat CI-11 at knife point after he ministered to an elderly woman in another hospital.

209. On July 30, 2003, Karageorge spoke to CI-11 again and told CI-11 that the asylum application was completely finished, including the police and doctor's certificates. Karageorge and CI-11 agreed to meet the next day in Alexandria to review the application. Karageorge and CI-11 met as planned in Alexandria on July 31, 2003. During the meeting, Karageorge reviewed the basic elements of the asylum application with CI-11. She also explained to CI-11 that he might have to appeal if the application were denied and discussed the costs associated with hiring a lawyer for the appeal.

210. On September 2, 2003, Karageorge sent CI-11 a revised draft of the asylum story and asylum application by mail from the post office in Annandale, Virginia. The asylum application was complete but for CI-11's signature. The asylum story was now typewritten and attached to the application as a formal supplement. The story was similar to the original draft, but now had six “events” instead of four. On September 19, 2003, Karageorge gave CI-11 a final draft of the application, including the asylum story, a fake “doctor's note,” and a fake “documented police report.” The doctor's note and

police report were both accompanied by English translations authored and signed by Karageorge.

211. Between November 12, 2003, and December 1, 2003, CI-11 and Karageorge spoke by telephone several times. During these calls, CI-11 and Karageorge discussed the need for CI-11 to approach an American doctor Karageorge knew to get a written opinion that CI-11 still suffered from the persecution he had been subjected to Indonesia. Karageorge felt that if the doctor would write such an opinion letter, CI-11 could present it to the asylum officer whenever CI-11 was interviewed. Karageorge thought a letter from the doctor would very likely sway the asylum officer to grant CI-11's case. Thus, during two of the telephone calls, Karageorge carefully instructed CI-11 how to lie to the doctor so that a favorable opinion letter would be written. In particular, Karageorge coached CI-11 to look sad and teary; to relate accounts of beatings and torture in Indonesia; and to speak of nightmares, a deep fear of returning to Indonesia, and a present life marked by fatigue and uncertainty.

212. On September 15, 2004, I mailed a notice of interview to 4574 Southland Ave., Alexandria, Virginia, the applicant address on CI-11's asylum application. This notice, which was prepared by the Asylum Office on official letterhead, informed CI-11 that his asylum interview had been scheduled for November 15, 2004, at the asylum office in Arlington, Virginia.

213. On October 27, 2004, CI-11 called Karageorge to discuss his upcoming interview. Karageorge advised CI-11 to obtain two letters from Indonesia to corroborate his asylum claim and told CI-11 what the letters should say. Karageorge stated that the first letter should be from an Indonesian pastor and should confirm that when in

Indonesia CI-11 (1) was an active member of the church, (2) visited patients in hospitals and prayed with them, and (3) suffered persecution several times at the hands of radical Muslims. Karageorge said the second letter should be from a Muslim and should confirm that when in Indonesia CI-11 (1) visited him in the hospital and prayed for him even though he was Muslim and (2) never came back to the hospital because he was beaten and tortured by anti-Christian Indonesians. Karageorge also instructed CI-11 to have his family in Indonesia mail an envelope to him at the address Karageorge put on his asylum application. CI-11 could then use this envelope to make it appear he lived at the address.

214. On November 1, 2004, CI-11 called Karageorge and arranged to meet her on November 3, 2004, to prepare for CI-11's interview. On November 3, 2004, CI-11 met Karageorge at Karageorge's house at 7800 Delano Court, Manassas, Virginia. During the meeting, Karageorge coached CI-11 and gave him tips. For example, she gave CI-11 a list of 230 questions the asylum officer might ask about his case and gave him suggestions about how to answer the questions.

IV. LABOR CERTIFICATION FRAUD

The Labor Certification Process

215. An alien seeking to immigrate to the United States may obtain an immigrant visa in order to perform skilled or unskilled labor in the United States. *See* 8 U.S.C. § 1153(b)(3)(A). If approved, this employment-based visa allows the alien to come to the United States and to apply for lawful permanent residence. In order to apply for such a visa, however, an alien must first obtain a formal certification from the Secretary of Labor that (1) there are insufficient U.S. workers qualified to do the work contemplated

and (2) the employment of the alien would not adversely affect the wages and working conditions of U.S. workers similarly employed. *See* 8 U.S.C. §§ 1153(b)(3)(C) and 1182(a)(5)(A).

216. The Department of Labor does not permit an alien to apply for a labor certification on his or her own. Rather, the Department requires the alien's prospective employer to file an Application for Alien Employment Certification, officially known as a Department of Labor form ETA 750, on behalf of the alien (hereinafter ETA 750 or labor certification application). *See* 20 C.F.R. § 656.21. The application has two parts: part A, entitled "Offer of Employment," that must be completed and signed under penalty of perjury by the employer; and part B, entitled "Statement of Qualifications of Alien," that must be completed and signed under penalty of perjury by the alien. In part A of the application, the employer represents that the employer has a specific job to fill; describes the nature, location, terms, and requirements of the job; and lists the name, address, and immigration status of the alien seeking the job. In part B of the application, the alien lists his name, present address, biographic information, immigration status, and proposed address if employed; describes his experience and qualifications for the job the employer was offering; and represents that he is willing and qualified to accept the job.

217. Once a labor certification application is complete, the prospective employer begins the application process by filing the application with the Department of Labor through a designated state employment agency. *See* 20 C.F.R. § 656.21. In Virginia, this agency is the Virginia Employment Commission (hereinafter VEC). The state employment agency reviews the application for completeness, ensures that the employer was offering the prevailing wage for the job listed in the application, and oversees any

recruiting and advertising the employer might be required to do as part of the certification process. Once the state agency completes this portion of the certification process, the agency forwards the application to the appropriate Department of Labor regional office for final determination. The regional office reviews the application and then either issues a final “labor certification” on behalf of the Secretary of Labor or denies the application.

218. If the Department of Labor approves the application and issues a certification, the alien’s prospective employer may then file an Immigrant Petition for Alien Worker, officially known as a form I-140, on the alien’s behalf with the Department of Homeland Security (DHS; formerly the Immigration and Naturalization Service or INS). If approved, this petition results in the issuance of an immigrant visa to the alien and allows the alien to immigrate to the United States and to apply for lawful permanent residence upon arrival.

219. In certain circumstances, an alien already in the United States may also use the labor certification process to remain in the United States as a lawful permanent resident. The initial process is the same as that described in paragraphs 215 through 218 above. The only difference is that an alien in the United States who is the beneficiary of an approved labor certification and I-140 does not need to leave the country, get a visa, and then return. Rather, the alien may adjust his status to that of a lawful permanent resident by filing an Application to Register Permanent Residency or Adjustment of Status, officially known as form I-485, with DHS. One important restriction exists for aliens who are unlawfully present in the United States at the time they file the I-485. Such aliens may only seek lawful permanent residence through a labor certification if

their prospective employer applied for the underlying labor certification prior to April 30, 2001.

Quarterly Employment Reports for Virginia Employers

220. Pursuant to § 32-20 of title 16 of the Virginia Administrative Code, each Virginia employer must file a quarterly employment report with the VEC. Among other things, this report must include the (1) the employer's name and business address; (2) the number of workers employed by the employer that quarter; and (3) the name, social security account number, and wages of each worker employed. To date, VEC records show that CIAS, AAPS, and PI have never filed a quarterly employment report.

Summary of Findings

221. My investigation has shown that Hans Gouw, Michael Wright, and Joandi Gani are involved in the preparation, submission, and sale of fraudulent labor certification applications. In particular, Hans Gouw has submitted approximately one hundred forty-one fraudulent applications on behalf of CIAS; Michael Wright has submitted approximately sixteen fraudulent applications on behalf of AAPS; and Joandi Gani has submitted approximately seventeen fraudulent applications on behalf of PI.

Labor Certification Fraud Committed by Hans Gouw and CIAS

222. From on or about April 30, 2001, through on or about June 30, 2004, CIAS submitted one hundred forty-one applications for labor certification to the Department of Labor through the VEC in Richmond, Virginia. The applications, all of which are still pending at the VEC, seek labor certification for open jobs at CIAS's office at 6155 Pohick Station Drive, Fairfax Station, Virginia. In every application, the job offered is the same, namely that of a full-time interpreter (on certain applications

“interpreter/translator” or “translator”) at rates of between \$7 and \$25 an hour. Hans Gouw signed the employer declaration in part A of every application as the executive director of CIAS. (My colleagues and I have compared these signatures with other known signatures of Gouw’s and determined that they match.) The alien declaration in part B of each application bears the signature of an individual Indonesian immigrant allegedly seeking work as an interpreter at CIAS.

223. As a general matter, I know these applications are fraudulent on their face for several reasons. First, CIAS is not a large, legitimate corporation needing to hire one hundred forty-one interpreters on a full-time basis at \$7 to \$25 an hour. Rather, it is an Indonesian cultural organization that operates from a few rooms in Hans Gouw’s residence and has never filed employment reports with the VEC. Second, all of the applications, including the parts A and B, were completed in the same handwriting and include identical language in sections calling for a particular or personal answer. This strongly suggests that the applications were not designed to hire a particular alien for a particular need, but rather were stock filings. Finally, one hundred thirty-three of the applications allege that the alien beneficiaries will reside at addresses I know to be illegitimate. These addresses and their illegitimacy are summarized in the following chart.

<i>Number of Applications</i>	<i>Alleged Future Address of Alien Beneficiary</i>	<i>Illegitimacy of that Address</i>
114	6155 Pohick Station Drive, Fairfax Station	Actual address of CIAS and Hans Gouw’s home
12	10079 Chestnut Wood Lane, Burke	Former address of CIAS and Kumala Nusantara
7	5506 Great Tree Court, Fairfax	Actual address of PI and J. Gandasaputra’s home

224. I also know that four particular applications Gouw filed through CIAS are fraudulent because one of my colleagues interviewed the alien beneficiaries of the applications. These beneficiaries are CI-8, CW-5, CW-6, and CW-7. In each of their applications, Gouw claims to have offered the alien beneficiary a job at CIAS as an Indonesian interpreter or translator. In part B of each application, the alien beneficiary in turn claims to have worked as a self-employed Indonesian interpreter or translator. When interviewed, however, each alien admitted that he or she had never worked as a self-employed translator or interpreter and had never said anything of the sort to Gouw. On the contrary, each alien stated that Gouw had instructed the alien to sign a blank labor certification application, which each alien did. Furthermore, each alien stated that Gouw never showed the alien the completed labor certification application or provided a copy. Each alien also stated that Gouw had agreed to file the labor certification application for the alien in return for a fee.

Labor Certification Fraud Committed by Michael Wright and AAPS

225. From on or about April 18, 2002, through on or about March 20, 2003, AAPS submitted sixteen applications for labor certification to the Department of Labor through the VEC in Richmond, Virginia. The applications, all of which are still pending at the VEC, seek labor certification for open jobs at AAPS's former office at 6003 Captain Marr Court, Fairfax Station. Michael Wright signed the employer declarations in all sixteen parts A in his capacity as company manager. (My colleagues and I have compared these signatures with Wright's known signature on his driver's license and determined that they match.) Indonesian immigrants allegedly seeking work at AAPS signed the alien declarations in part B. The positions offered in the applications are as

follows: seven interpreters, four document translators, two book keepers, two interviewers, and one care giver.

226. I know these applications are fraudulent on their face for several reasons. First, AAPS is not legitimate corporation capable of hiring sixteen new employees. Rather, it is an unincorporated business that (1) has approximately four employees, (2) has never filed employment reports with the VEC, and (3) operates from a three-room office. Second, all of the applications, including the parts A and B, were completed in the same handwriting, which handwriting matches exactly the handwriting used to complete the seventeen applications filed by Petra International (see paragraphs 229 and 230 below). Third, the applications include identical language in sections calling for a particular or personal answer. Finally, fifteen of the applications allege that the alien beneficiary will reside at an address I know to be illegitimate or suspect. The addresses and their illegitimacy are summarized in the following chart.

<i>Number of Applications</i>	<i>Alleged Future Address of Alien Beneficiary</i>	<i>Illegitimacy of that Address</i>
7	9538 Old Keene Mill Road, Fairfax Station	Actual address of a business, Digital Photo
5	10807 Oak Wilds Court, Burke	Townhouse owned by Megawaty Gandasaputra
1	7138 Little River Turnpike, Annandale	Actual address of a business, Parcel Plus
1	5622G Ox Road, Fairfax Station	Actual address of a business, Parcel Plus

227. On or about February 13, 2003, Michael Wright submitted another application for labor certification to the Department of Labor through the Maryland Office of Foreign Labor Certification in Baltimore, Maryland. This application, which is pending before the Office of Foreign Labor Certification, seeks labor certification for open job as a cook at a restaurant in Rockville, Maryland. Michael Wright signed the application in part A as the authorized agent of the restaurant. (My colleagues and I have

compared this signature with Wright's known signature on his driver's license and determined that they match.)

228. I know this application is also fraudulent because one of my colleagues interviewed the alien beneficiary of the application, CI-6. During his interview, CI-6 stated that he approached Megawaty Gandasaputra at her house on Captain Marr Court in Fairfax Station, Virginia, in 2002 to inquire about labor certification. Gandasaputra agreed to prepare an application for CI-6 in return for a cash fee, which fee CI-6 paid Gandasaputra by down payment and then serial installments. Gandasaputra told CI-6 at the time that Michael Wright was an attorney who worked for her. CI-6 stated that Gandasaputra and Wright completed his labor certification application based on information he gave them, and that he later signed the application before Michael Wright. However, when my colleague showed CI-6 the documents that had been submitted in support of the labor certification application, CI-6 did not recognize some of them. In particular, CI-6 stated that the graduation certificate and the transcript of grades submitted by Gandasaputra and Wright in support of his application were fraudulent. Although all the documents were in CI-6's name, CI-6 stated that they were forgeries which CI-6 had never seen nor authorized. CI-6 added that his educational background included in part B of the labor certification application was false and had been made up by Gandasaputra or Wright.

Labor Certification Fraud Committed by Joandi Gani and Petra International

229. Over the period from June 6, 2002, to April 25, 2003, PI submitted seventeen applications for labor certification to the Department of Labor through the VEC in Richmond, Virginia. The applications, fifteen of which are still pending at the

VEC (one was withdrawn; another was a duplicate), seek labor certification for open jobs at PI's office at 5506 Great Tree Court, Fairfax, Virginia. Joandi C. Gani signed the employer declarations in all seventeen parts A in his capacity as director of management. (My colleagues and I have compared these signatures with Gani's known signature on his driver's license and immigration documents, and determined they match.) Indonesian immigrants allegedly seeking work at PI signed the alien declarations in part B. The positions offered in the applications are as follows: four administrative clerks, three administration supervisors, two assistant managers, two book keepers, one export division clerk, one data entry employee, one assistant human relations employee, one assistant accounting manager, one administration clerk supervisor, and one accounting manager.

230. I know these applications are all fraudulent for several reasons. First, PI does not appear to be an active business. Joandi C. Gani, PI's alleged director of management, is actually a 19-year-old student at Pennsylvania State University. PI's alleged headquarters, the building at 5506 Great Tree Court, Fairfax, Virginia, is a two-story residence that shows no signs of ever having been home to a corporation. In addition, the company has never filed quarterly employment reports with the VEC and has allowed its Virginia incorporation to expire. As a result, it seems highly unlikely Petra International exists, yet alone seeks seventeen new employees. Second, all of the applications, including the parts A and B, were completed in the same handwriting, which handwriting matches exactly the handwriting used to complete the sixteen applications filed by AAPS (see paragraphs 225 and 226 above). Third, the applications include identical language in sections calling for a particular or personal answer. Finally,

sixteen of the seventeen applications allege that the alien beneficiary will reside at an address I know to be illegitimate or suspect. The addresses and their illegitimacy are summarized in the following chart.

<i>Number of Applications</i>	<i>Alleged Future Address of Alien Beneficiary</i>	<i>Illegitimacy of that Address</i>
5	9538 Old Keene Mill Road, Fairfax Station	Actual address of a business, Digital Photo; also used as the address for seven AAPS beneficiaries described above
3	7138 Little River Turnpike, Annandale	Actual address of a business, Parcel Plus; also used as the address for one AAPS beneficiary described above
3	10332 Main Street, Fairfax	Actual address of a business, United Parcel Service
3	5622G Ox Road, Fairfax Station	Actual address of a business, Parcel Plus; also used as the address for one AAPS beneficiary described above
2	333 Maple Avenue, Vienna	Actual address of a business, Parcel Plus
1	6003 Captain Marr Court, Fairfax Station	Actual address of Michael Wright and M. Gandasaputra's home

V. PASSPORT FRAUD

231. On or about April 23, 2003, CI-8 called Hans Gouw by telephone. Gouw knew of CI-8 already because Gouw and Gouw's assistant, Johnson Aliffin, had prepared and submitted a fraudulent asylum application for CI-8 in February 2001. This application contained false a declaration written by Aliffin that claimed CI-8 had been beaten and stoned by Muslim Indonesians on account of his Chinese ancestry and his adherence to Christianity. According to CI-8, when he called Gouw on April 23 he told Gouw that his claim for asylum had been denied and that he needed prompt assistance so he wouldn't have to leave the United States. Gouw replied that he knew someone who could provide CI-8 with a birth certificate with which CI-8 could obtain a U.S. passport. As it had been several years since Gouw had spoken with this person, however, Gouw also suggested that CI-8 consider an arranged marriage to a U.S. citizen. Gouw told CI-8 that either method of remaining in the U.S. would cost CI-8 \$10,000.

232. On or about May 8, 2003, CI-8 placed a further call to Gouw. CI-8 and Gouw discussed various ways CI-8 could obtain legal status in the U.S. Gouw ultimately recommended that CI-8 attempt to get a U.S. passport. To that end, Gouw said he would get CI-8 a U.S. passport directly for \$15,000. Gouw added that CI-8 would have to pay half of the fee up front and should expect the process to take at least two months. CI-8 then asked Gouw if he could still arrange a marriage for CI-8. Gouw said he could, but that he had to find a U.S. citizen for CI-8 to marry and that the price would depend on the citizen he found.

233. On or about May 21, 2003, CI-8 placed another call to Gouw. According to CI-8, Gouw told him he was still trying to reach an associate concerning the passport and to find a citizen to marry CI-8. On or about July 3, 2003, CI-8 placed a further call to Gouw. According to CI-8, Gouw reiterated that he was working to find a citizen to marry CI-8 and to contact his associate concerning the passport. Gouw added that his associate could produce a U.S. birth certificate for CI-8.

234. On or about August 5, 2003, CI-8 placed another call to Gouw. According to CI-8, Gouw told him he could not obtain the birth certificate and passport for CI-8 because it was too difficult to locate his associate. Gouw then asked if CI-8 wanted Gouw to pursue an appeal of CI-8's denied asylum application for \$300. CI-8 agreed.

235. On or about August 6, 2003, CI-8 called Gouw again and expressed frustration that Gouw had not obtained a passport for him. In reply, Gouw asked CI-8 if CI-8 would be willing to pay for Gouw to travel to another state so that he could find his associate. When CI-8 stated that he would be willing, Gouw told CI-8 to call him back on August 26th to discuss it further. On September 4, 2003, CI-8 called Gouw to discuss

his trip. Gouw stated that he was planning to go in a few weeks and would spend roughly three days there. Gouw told CI-8 to call him back on September 18th to confirm.

236. About this time, Gouw left CI-8 two telephone messages. In these messages, Gouw told CI-8 that he had located his associate and that the associate could provide CI-8 with a U.S. passport in return for \$20,000. As a result, Gouw stated that he no longer needed to travel on CI-8's behalf. On or about September 9, 2003, CI-8 called Gouw back to inquire about the details of getting the passport. According to CI-8, Gouw confirmed his earlier telephone messages and told CI-8 that CI-8 would need to provide Gouw with a new name and date of birth for the passport. Gouw said he would pass this information on to his associate who would use the information to get CI-8 a U.S. passport. Gouw added that CI-8 would have to pay Gouw a down payment of \$7,500, with the remaining balance of \$12,500 due upon delivery of the passport. CI-8 agreed to these terms and said he would travel to Virginia to pay Gouw in person.

237. On or about September 18, 2003, CI-8 again called Gouw. According to CI-8, he made an appointment to meet Gouw in Virginia on October 2, 2003, to pay Gouw the \$7,500 down payment for the passport. During the conversation, CI-8 asked Gouw whether Gouw could speed the process if CI-8 paid Gouw a larger down payment. Gouw said that he couldn't. According to Gouw, the process was a very delicate one and could not be rushed.

238. On or about October 2, 2003, CI-8 met Gouw at Gouw's house at 6155 Pohick Station Drive, Fairfax Station, Virginia. Gouw, his wife Isnayanti, his sister Jenny Gandasaputra, and Hanny Kembraun were all there. According to CI-8, shortly after he arrived he met with Gouw in Gouw's office in the house. In the office, Gouw

showed CI-8 a list of three other people who were interested in getting U.S. passports through Gouw. Gouw said that he, too, was going to get a passport from his associate, which made for a total of five passports including CI-8's. Gouw stated that he might send Hanny Kembuan to meet with his associate to further the process.

239. At Gouw's request, CI-8 gave Gouw a variation of his real name for the passport and a false date of birth. CI-8 also paid Gouw \$7,500 by money order. Gouw in turn wrote CI-8 a sales receipt on CIAS letterhead. The receipt stated "U.S. Citizenship Processing Fee \$20,000" and noted that CI-8 had paid a down payment of \$7,500 with a balance to pay of \$12,500. Gouw signed the bottom of the receipt.

240. During the same meeting at Gouw's house, Gouw gave CI-8 the name, address, and phone number of one of his Indonesian clients who was looking to marry an Indonesian. According to Gouw this woman had obtained U.S. citizenship by marrying an American, but was now divorced. Gouw suggested that CI-8 might marry her in order to get his green card. While waiting for his cab, CI-8 also overheard Gouw tell Hanny Kembuan that if Kembuan would get his U.S. citizenship he, Gouw, knew a woman who would marry Kembuan to get her green card and would give Kembuan a new 2003 Honda Accord in return.

241. On December 15, 2003, CI-8 called Gouw to check on the progress of the passport. Gouw stated that he would shortly meet with his associate to see where things stood. On January 3, 2004, Gouw left CI-8 a telephone message stating that his associate would need another two months to produce the passport. According to Gouw, his associate was being cautious. On or about January 6, 2004, CI-8 called Gouw and asked him if the passport could be made more quickly. Gouw said no and reiterated that his

associate was being very cautious. On March 3, 2004, CI-8 made a further call to Gouw concerning the passport. Gouw again stated that his contact was being cautious, but assured CI-8 that the associate was about to produce CI-8's application. To that end, Gouw asked CI-8 to send him two passport photographs to send to the contact.

242. On or about May 15, 2004, CI-8 called Gouw again to inquire about the passport. According to CI-8, Gouw stated that he needed CI-8's mailing address so that his contact could mail the passport to him when it was ready. CI-8 agreed and gave Gouw his mailing address. Gouw also stated that if CI-8 wanted him to help his friends get passports, the fee would be \$35,000 and take six to seven months. CI-8 asked Gouw how he was to pay the remaining \$12,500 he owed Gouw for the passport. Gouw said he was unsure because his fee was only \$2,500—the rest going to his associate—and said he would have to call his associate. Gouw then hung up and called CI-8 back about fifteen minutes later. In this second call, Gouw told CI-8 that his associate was coming to Virginia and that CI-8 could pay him in person in cash at Gouw's house.

243. On or about May 25, 2004, Gouw called CI-8 and informed him that his associate was already in town. Gouw further stated that he had paid the associate \$10,000 for CI-8 out of his own money. As a result, Gouw asked CI-8 to wire \$10,000 to Gouw's bank account at Wachovia Bank. CI-8 was initially hesitant to pay Gouw \$10,000 without having received the passport. After repeated telephone calls from Gouw insisting on the payment, CI-8 relented and agreed to pay Gouw in person on June 21, 2004, at Gouw's house at 6155 Pohick Station Drive, Fairfax Station, Virginia.

244. On or about June 21, 2004, CI-8 met Gouw at Gouw's house at 6155 Pohick Station Drive, Fairfax Station, Virginia. During this meeting, Gouw told CI-8 that the

passport would be obtained by means of a false U.S. birth certificate. CI-8 gave Gouw \$12,500 in cash as final payment for the passport, which \$12,500 included the \$10,000 Gouw claimed to have paid on CI-8's behalf. Gouw gave CI-8 a signed receipt for the \$12,500, in which he characterized the payment as one for "Greencard/Naturalization."

245. State Department records show that on or about August 16, 2004, an application for a U.S. passport in CI-8's name was filed with the Department of State at a processing center in New Hampshire. This application gave CI-8's address as 13105 Canova Drive, Manassas, Virginia. The clerks who received the application noticed that it lacked the necessary documentary support and returned it by mail to the Canova Drive address. To date, the application has not been resubmitted.

246. On or about October 13, 2004, CI-8 met Gouw again at Gouw's house at 6155 Pohick Station Drive, Fairfax Station, Virginia. CI-8 asked Gouw what the status of the passport was. Gouw replied that his "contact" needed CI-8's fingerprint to get the passport through and had CI-8 provide his fingerprint. Gouw and CI-8 then went to McDonald's for lunch. During lunch, Gouw told CI-8 that the fingerprint would be the last step in getting the passport.

VI. VIRGINIA DMV FRAUD

A. Introduction

The DMV Process for Driver's Licenses and Identification Cards

247. The Virginia DMV is authorized to issue Virginia driver's licenses and identification cards, but only to residents of the Commonwealth of Virginia. *See* Va. Code § 46.2-323.1. To obtain a Virginia driver's license or identification card, an applicant must present the DMV proof of identity and Virginia residence. The DMV

requires two official identification documents as proof of identity and one official or business document as proof of Virginia residence. Prior to September 21, 2001, however, applicants lacking the required documentary proof of identity and Virginia residence could complete and submit DMV forms DL6 and DL51 in lieu of the required documents.

248. DMV form DL6 is an identity affidavit. Prior to September 21, 2001, the DMV would accept a properly completed DL6 form in lieu of one of the two identification documents required to apply for a license or identification card. The form requires the applicant to provide and to swear to his name, address, and basic biographic information. The form further requires the sworn, notarized certification of an attorney. Through the certification, the attorney swears that he personally knows the applicant and has verified the applicant's identity by reviewing an identity document presented by the applicant. This certification must be made in the presence of a notary public, and the notary must sign and date the form as well.

249. DMV form DL51 is a residency certification. Prior to September 21, 2001, the DMV would accept a properly completed DL51 form in lieu of documentary proof of Virginia residence. The form requires the applicant to provide and to swear to his name and to his place and length of Virginia residence. The form further requires the sworn, notarized certification of a Virginia resident. Through the certification, the Virginia resident swears that he is personally acquainted with the applicant and that the applicant lives at the Virginia address listed on the form. This certification must be made in the presence of a notary public or DMV clerk, and the notary or clerk must sign and date the form as well. The form further requires that the certifying Virginia resident present a

Virginia driver's license or identification card as proof of identity and that the resident write his or her Virginia DMV identification number on the DL51.

250. Virginia driver's licenses and Virginia identification cards are identification documents made and issued by and under the authority of the Commonwealth of Virginia. Submitting a DL51 form to the DMV in support of an application for a driver's license or identification card causes the unlawful production of such a Virginia driver's license or identification card.

251. The production of Virginia driver's licenses and identification cards in this case was in and affected interstate commerce in several ways. First, many of the recipients of the licenses and identification cards in this case were in fact aliens living in other states who traveled to Virginia to obtain the licenses and cards through the targets identified above. Second, these same aliens then used the licenses and identification cards they obtained to drive, to work, and to otherwise conduct their daily lives in their home states. Third, the printing machines, plastic cards, and laminates the DMV uses to produce Virginia driver's licenses, learner's permits, and identification cards are supplied to the DMV under contract by Digimarc ID Systems, L.L.C., of Burlington, Massachusetts. All of the printing machines, plastic cards, and laminates Digimarc provides to DMV are made in other states and shipped to the DMV in Virginia from Digimarc's warehouse in Fort Wayne, Indiana. The printing machines, for example, are made in Japan; the plastic cards in Massachusetts; and the laminates in Pennsylvania.

B. Evidence of Identification Document Fraud Committed by Certain Targets

252. My investigation has revealed that Hans Gouw, Isnayanti Gouw, Jenny Gandasaputra, Herman Tanudjaya, Johnson Aliffin, Raymond Marschall, Albert Warong,

Sari Tanudjaya, Johannes Ticoalu, Irawan Muljadi, Megawaty Gandasaputra, and Nany Kumala have engaged in widespread identification document fraud. In particular, I believe that these twelve targets aided approximately 1876 immigrants to obtain genuine Virginia driver's licenses and identification cards by fraud between December 27, 1999, and September 31, 2001, through the preparation and submission of false DL51 forms. In addition, I have learned that Brigitta Parera has obtained Virginia driver's licenses and identification cards in three different names.

253. DMV records show that Hans Gouw, Isnayanti Gouw, Jenny Gandasaputra, Herman Tanudjaya, Johnson Aliffin, Raymond Marschall, Albert Warong, Sari Tanudjaya, Johannes Ticoalu, Irawan Muljadi, Megawaty Gandasaputra, and Nany Kumala have the following Virginia DMV identification numbers (either a social security number or a "T" number assigned by DMV).

Target	Virginia DMV Identification Number
Hans Gouw	Initially 603-82-4095; changed to T61-41-9937
Isnayanti Gouw	610-78-1570
Jenny Gandasaputra	616-11-4637; changed to T66-12-7729
Herman Tanudjaya	T66-06-8781
Johnson Aliffin	T62-46-2112
Raymond Marschall	T66-16-7167
Albert Warong	220-88-0195; changed to T65-34-0318
Irawan Muljadi	620-96-2520; changed to T60-82-9619
Sari Tanudjaya	T66-06-2593
Johannis Ticoalu	618-50-0702
Megawaty Gandasaputra	T66-12-8565; changed to 620-96-9917; changed to A66-11-6329
Nany Kumala	T66-14-3958

254. As part of my investigation, I caused the Virginia DMV to search the DL-51 forms submitted to the DMV in the years 1999 through 2001 by applicants for driver's licenses, learner's permits, and identification cards. Specifically, I asked the DMV to search its records for DL-51 forms bearing either (1) the name and signature of a target of my investigation as the certifying Virginia resident or (2) an address I knew to be controlled by a target. This search revealed that the following targets collectively certified the Virginia address of 1876 applicants for a Virginia driver's license, learner's permit, or identification card during the years 1999 through 2001:

- a) Hans Gouw: 41 certifications;
- b) Isnayanti Gouw: 268 certifications;
- c) Jenny Gandasaputra: 157 certifications;
- d) Herman Tanudjaja: 44 certifications;
- e) Johnson Aliffin: 14 certifications;
- f) Raymond Marschall: 15 certifications;
- g) Albert Warong: 509 certifications;
- h) Irawan Muljadi: 36 certifications;
- i) Sari Tanudjaya: 261 certifications;
- j) Johannis Ticoalu: 159 certifications;
- k) Megawaty Gandasaputra: 360 certifications; and
- l) Nany Kumala: 23 certifications.

Hans Gouw

255. Between December 27, 1999, and September 19, 2001, Hans Gouw signed forty-one DL51 forms as Liong H. Gouw on behalf of immigrants seeking Virginia driver's licenses and identification cards. (I have compared Gouw's signature on these forms with a known example of his signature and determined they match.) All of these DL51s were submitted to the DMV at DMV offices in Woodbridge, Arlington, or Fairfax, Virginia, and in nearly every instance resulted in the issuance of a Virginia driver's license or identification card to the immigrant applicant. In all forty-one DL51

forms, Gouw certified that he was personally acquainted with the applicant and that the applicant actually lived at the Virginia address the applicant listed as his principal residence. As proof of his identity, Gouw listed his DMV identification number, initially 603-82-4095 and later T61-41-9937, on each DL51 form.

256. The following chart summarizes the forty-one DL51 forms Gouw certified.

Address of the Applicant as Certified by Hans Gouw	Type of Building	Gouw's Stated Address	Number of Applicants	Dates Certified
10702 Oakenshaw Court, Burke, Virginia	House	10702 Oakenshaw Court, Burke, Virginia	1	12/27/99
10079 Chestnut Wood Lane, Burke, Virginia	Townhouse	10079 Chestnut Wood Lane, Burke, Virginia	34	4/26/00-11/15/00
6155 Pohick Station Drive, Fairfax Station, Virginia	House	6155 Pohick Station Drive, Fairfax Station, Virginia	6	1/13/01-9/19/01

Interestingly, Gouw stated on the first DL51 he signed on December 27, 1999, that he had lived at 10702 Oakenshaw Court since December 1997. Yet on vast majority of the DL51 forms on which he gave his address as 10079 Chestnut Wood Lane he claimed to have lived at that address since 1997 as well; and on the DL51s forms on which he stated he lived at 6155 Pohick Station Drive, he claimed to have lived there since 1998.

257. I believe that most if not all of the forty-one DL51s Gouw certified were fraudulent for the following reasons. First, 10079 Chestnut Wood Lane is a residence, not an apartment building. As a result, it is inconceivable that thirty-four of the applicants truly lived at that address in the same year as the DL51 forms claim. Second, 6155 Pohick Station Drive has been Hans and Isnayanti Gouw's residence and the headquarters of CIAS since 2001. Thus, it was almost certainly not the principle residence of the six applicants on the DL51 forms he certified. Third, Gouw clearly did not live at 10702 Oakenshaw Court, 10079 Chestnut Wood Lane, and 6155 Pohick

Station Drive simultaneously in 1998, but that is precisely what he claimed on the forms. Finally, at the same time Gouw was certifying that thirty-four applicants lived at 10079 Chestnut Wood Lane and that six applicants lived at 6155 Pohick Station Drive, several other targets were doing the same. For example, Isnayanti Gouw, Nany Kumala, and Johnson Allifin collectively certified that another two hundred eighty-one applicants lived at 10079 Chestnut Wood Lane, while Isnayanti Gouw and Jenny Gandasaputra certified that another fourteen applicants lived at 6155 Pohick Station Drive.

Isnayanti Gouw

258. Between January 21, 2000, and September 8, 2001, Isnayanti Gouw signed two hundred fifty-seven DL51 forms on behalf of immigrants seeking Virginia driver's licenses and identification cards. (I have compared Gouw's signature on these forms with a known example of her signature and informally determined they match.) All of these DL51s were submitted to the DMV at various DMV offices within the Eastern District of Virginia, including several offices in Fairfax County, Virginia, and in nearly every instance resulted in the issuance of a Virginia driver's license or identification card to the immigrant applicant. In all two hundred fifty-seven DL51 forms, Gouw certified that she was personally acquainted with the applicant and that the applicant actually lived at the Virginia address the applicant listed as his principal residence. As proof of her identity, Gouw wrote her DMV identification number, 610-78-1570, on each DL51 form.

259. The following chart summarizes the two hundred fifty-seven DL51 forms Isnayanti Gouw certified.

Address of the Applicant as Certified by Isnayanti Gouw	Type of Building	Gouw's Stated Address	Number of Applicants	Dates Certified
10079 Chestnut Wood Lane, Burke, Virginia	Townhouse	10079 Chestnut Wood Lane, Burke, Virginia	237	1/21/00-9/8/01
10079 Chestnut Wood Lane, Burke, Virginia	Townhouse	6155 Pohick Station Drive, Fairfax Station, Virginia	9	3/4/00-8/8/01
6155 Pohick Station Drive, Fairfax Station, Virginia	House	6155 Pohick Station Drive, Fairfax Station, Virginia	10	12/9/00-8/18/01
6155 Pohick Station Drive, Fairfax Station, Virginia	House	10079 Chestnut Wood Lane, Burke, Virginia	1	9/8/01

As the chart reveals, Isnayanti Gouw, like her husband, was also claiming to live at two different places at the same time, in this case 10079 Chestnut Wood Lane and 6155 Pohick Station Drive. Indeed, when asked to give the length of time she had lived at these addresses on the DL51, Gouw uniformly replied three years regardless of the address used.

260. I believe that most if not all of the two hundred fifty-seven DL51s Isnayanti Gouw certified were fraudulent for the following reasons. First, 10079 Chestnut Wood Lane is a residence, not an apartment building. As a result, it is inconceivable that two hundred forty-six of the applicants truly lived at that address during 2000 and 2001 as the forms claim. Second, 6155 Pohick Station Drive has been Hans and Isnayanti Gouw's residence and the headquarters of CIAS since 2001. Thus, it was almost certainly not the principle residence of the eleven applicants on the DL51 forms she certified. Third, Gouw could not have lived simultaneously at 10079 Chestnut Wood Lane and 6155 Pohick Station Drive as she claimed on the forms. For example, on August 18, 2001, Gouw signed four DL51s that were submitted to the DMV by four different applicants. On all four applications, Gouw certified that the applicant lived at 10079 Chestnut Wood Lane. On three of these same four DL51s, Gouw stated that she lived at 10079 Chestnut

Wood Lane, but on the fourth she listed her address as 6155 Pohick Station. Finally, at the same time Gouw was certifying that two hundred forty-six applicants lived at 10079 Chestnut Wood Lane and eleven applicants lived at 6155 Pohick Station Drive, several other targets were doing the same. For example, Hans Gouw, Johnson Aliffin, and Nany Kumala collectively certified that another sixty-nine applicants had lived at 10079 Chestnut Wood Lane, while Hans Gouw and Jenny Gandasaputra certified that another nine had lived at 6155 Pohick Station Drive.

Evidence of Identification Document Fraud Committed by Jenny Gandasaputra

261. Between July 1, 2000, and August 18, 2001, Jenny Gandasaputra signed one hundred fifty-seven DL51 forms on behalf of immigrants seeking Virginia driver's licenses and identification cards. (I have compared Gandasaputra's signature on these forms with a known example of her signature and the overwhelming majority match.) Nearly all of these DL51s were submitted to the DMV at various DMV offices in Fairfax County, Virginia, and in nearly every instance resulted in the issuance of a Virginia driver's license or identification card to the immigrant applicant. In all one hundred fifty-seven DL51 forms, Gandasaputra certified that she was personally acquainted with the applicant and that the applicant actually lived at the Virginia address the applicant listed as his principal residence. On all the same forms, Gandasaputra stated that she lived at 5506 Great Tree Court, Fairfax, Virginia, her true address. As proof of his identity, Gandasaputra listed her DMV identification number, 616-11-4637, on each DL51 form.

262. The following chart summarizes the one hundred fifty-seven DL51 forms Gandasaputra certified.

Address of the Applicant as Certified by Jenny Gandasaputra	Type of Building	Gandasaputra's Stated Address	Number of Applicants	Dates Certified
5506 Great Tree Court, Fairfax, Virginia	House	5506 Great Tree Court, Fairfax, Virginia	154	7/1/00-8/18/01
6155 Pohick Station Drive, Fairfax Station, Virginia	House	5506 Great Tree Court, Fairfax, Virginia	3	7/7/01-8/18/01

263. I believe that most if not all of these DL51s Gandasaputra certified were fraudulent for the following reasons. First, because these addresses are single-family residences, it is inconceivable that all the applicants listed on the DL51 forms truly were Virginia residents living at the addresses Gandasaputra certified. In particular, it is extremely unlikely that one hundred fifty-four individuals lived at 5506 Great Tree Court, Fairfax, Virginia, with Gandasaputra over a span of thirteen months. Second, at the same time Gandasaputra was certifying that one hundred fifty-four applicants lived at 5506 Great Tree Court, two other targets—Herman Tanudjaja, and Raymond Marschall—were doing the same for another sixty applicants. Likewise, Hans and Isnayanti Gouw certified that another seventeen had lived at 6155 Pohick Station Drive.

Evidence of Identification Document Fraud Committed by Herman Tanudjaja

264. Between November 4, 2000, and August 18, 2001, Herman Tanudjaja signed forty-four DL51 forms on behalf of immigrants seeking Virginia driver's licenses and identification cards. (I have compared Tanudjaja's signature on these forms with a known example of his signature and they all match.) All of these DL51s were submitted to the DMV at various DMV offices within Fairfax County, Virginia, and in nearly every instance resulted in the issuance of a Virginia driver's license or identification card to the immigrant applicant. In all forty-four DL51 forms, Tanudjaja certified that he was personally acquainted with the applicant and that the applicant actually lived at the

Virginia address the applicant listed as his principal residence. As proof of his identity, Tanudjaja listed his DMV identification number, T66-06-8781, on each DL51 form.

265. The following chart summarizes the forty-four DL51 forms Tanudjaja certified.

Address of the Applicant as Certified by Herman Tanudjaja	Type of Building	Tanudjaja's Stated Address	Number of Applicants	Dates Certified
5506 Great Tree Court, Fairfax, Virginia	House	5506 Great Tree Court, Fairfax, Virginia	44	11/4/00-8/18/01

266. I believe that most if not all of these DL51s Tanudjaja certified were fraudulent for the following reasons. First, because this address is a single-family residence, it is inconceivable that all the applicants listed on the DL51 forms truly were Virginia residents living at 5506 Great Tree Court, Fairfax, Virginia. Second, it is extremely unlikely that Tanudjaja would live there as well with all forty-four individuals over a span of nine months. Third, at the same time Tanudjaja was certifying that forty-four applicants lived at this address, two other targets—Jenny Gandasaputra and Raymond Marschall—were doing the same for another one hundred sixty-nine applicants.

Evidence of Identification Document Fraud Committed by Johnson Aliffin

267. Between October 21, 2000, and July 12, 2001, Johnson Aliffin signed fourteen DL51 forms on behalf of immigrants seeking Virginia driver's licenses and identification cards. (I have compared Aliffin's's signature on these forms with a known example of his signature and they all match.) All of these DL51s were submitted to the DMV at various DMV offices in Fairfax County, Virginia, and in nearly every instance resulted in the issuance of a Virginia driver's license or identification card to the immigrant applicant. In all fourteen DL51 forms, Aliffin certified that he was personally

acquainted with the applicant and that the applicant actually lived at the Virginia address the applicant listed as his principal residence. As proof of his identity, Aliffin listed his DMV identification number, T62-46-2112, on each DL51 form.

268. The following chart summarizes the fourteen DL51 forms Aliffin certified.

Address of the Applicant as Certified by Johnson Aliffin	Type of Building	Aliffin's Stated Address	Number of Applicants	Dates Certified
10079 Chestnut Wood Lane, Burke, Virginia	Townhouse	10079 Chestnut Wood Lane, Burke, Virginia	12	10/21/00-3/31/01
8071 Tributary Court, Springfield, Virginia	Townhouse	8071 Tributary Court, Springfield, Virginia	2	6/16/01; 7/12/01

269. I believe that most if not all of the twelve DL51s Aliffin certified as living at 10079 Chestnut Wood Lane were fraudulent for the following reasons. First, because this address is a single-family residence, it is inconceivable that all the applicants listed on the DL51 forms truly were Virginia residents living at the address as Aliffin certified. Second, at the same time Aliffin was certifying that twelve applicants lived at this address, three other targets—Hans Gouw, Isnayanti Gouw, and Nany Kumala—were doing the same for another three hundred three applicants.

Evidence of Identification Document Fraud Committed by Raymond Marschall

270. Between February 17, 2001, and August 18, 2001, Raymond Marschall signed fifteen DL51 forms on behalf of immigrants seeking Virginia driver's licenses and identification cards. (I have compared Marschall's signature on these forms with a known example of his signature and they all match.) All of these DL51s were submitted to the DMV at various DMV offices in Fairfax County, Virginia, and in nearly every instance resulted in the issuance of a Virginia driver's license or identification card to the immigrant applicant. In all fifteen DL51 forms, Marschall certified that he was

personally acquainted with the applicant and that the applicant actually lived at the Virginia address the applicant listed as his principal residence. As proof of his identity, Marschall listed his DMV identification number, T66-16-7167, on each DL51 form.

271. The following chart summarizes the fifteen DL51 forms Marschall certified.

Address of the Applicant as Certified by Raymond Marschall	Type of Building	Marschall's Stated Address	Number of Applicants	Dates Certified
5506 Great Tree Court, Fairfax, Virginia	House	5506 Great Tree Court, Fairfax, Virginia	15	2/17/01-8/18/01

272. I believe that most if not all of these DL51s Marschall certified were fraudulent for the following reasons. First, because this address is a single-family residence, it is inconceivable that all the applicants listed on the DL51 forms truly were Virginia residents living at the address Gandasaputra certified. In particular, it is extremely unlikely that fifteen individuals lived at 5506 Great Tree Court, Fairfax, Virginia, with Marschall over a span of six months, particularly when the house actually belonged to Jenny Gandasaputra. Second, at the same time Marschall was certifying that fifteen applicants lived at 5506 Great Tree Court, two other targets, Jenny Gandasaputra and Herman Tanudjaja, were doing the same for another one hundred ninety-eight applicants.

Evidence of Identification Document Fraud Committed by Irawan Muljadi

273. Between February 28, 2001, and July 21, 2001, Irawan Muljadi signed thirty-six DL51 forms on behalf of immigrants seeking Virginia driver's licenses and identification cards. (I have compared Muljadi's signature on these forms with a known example of his signature and all but two or three match.) All of these DL51s were

submitted to the DMV at various DMV offices in Fairfax and Arlington Counties, Virginia, and in nearly every instance resulted in the issuance of a Virginia driver's license or identification card to the immigrant applicant. In all thirty-six DL51 forms, Muljadi certified that he was personally acquainted with the applicant and that the applicant actually lived at the Virginia address the applicant listed as his principal residence. As proof of his identity, Muljadi wrote his DMV identification number, 620-96-2520, on each DL51 form.

274. The following chart summarizes the thirty-six DL51 forms Muljadi certified.

Address of the Applicant as Certified by Irawan Muljadi	Type of Building	Muljadi's Stated Address	Number of Applicants	Dates Certified
10807 Oak Wilds Court, Burke, Virginia	House	10807 Oak Wilds Court, Burke, Virginia	36	2/28/01-7/21/01

275. I believe that most if not all of the thirty-six DL51s Muljadi certified were fraudulent for the following reasons. First, because 10807 Oak Wilds Court is a family residence and not an apartment building, it is inconceivable that the thirty-six applicants listed on the DL51 forms truly were Virginia residents living at that same address within a five-month period. Second, at the same time Muljadi was certifying that thirty-six applicants lived at 10807 Oak Wilds Court, Burke, Virginia, his then wife—Megawaty Gandasaputra—was doing the same for another forty-six applicants.

Evidence of Identification Document Fraud Committed by Albert Warong

276. Between January 10, 2000, and September 31, 2001, Albert Warong signed five hundred and nine DL51 forms on behalf of immigrants seeking Virginia driver's licenses and identification cards. (I have compared Warong's signature on these forms

with a known example of his signature and the overwhelming majority match.) All of these DL51s were submitted to the DMV at various DMV offices in Fairfax County and the City of Alexandria, Virginia, and in nearly every instance resulted in the issuance of a Virginia driver's license or identification card to the immigrant applicant. On all of the DL51 forms, Warong certified that he was personally acquainted with the applicant and that the applicant actually lived at the Virginia address the applicant listed as his principal residence. On the vast majority, Warong stated that he lived at 10702 Oakenshaw Court, Burke, Virginia. As proof of his identity, Warong listed his DMV identification number, initially 220-88-0195 and later T65-34-0318, on each DL51 form.

277. Because Warong filed so many fraudulent DL51s I will not review each and every one here. Rather, I offer the following chart that summarizes the bulk of his certifications during the time in question.

Address of the Applicant as Certified by Warong	Dates Certified	Type of Building	Number of Applicants
7306 Robert Lane, Falls Church, Virginia	1/13/00-9/31/01	Townhouse	89
10702 Oakenshaw Court, Burke, Virginia	1/10/00-6/18/01	House	72
9167 Broken Oak Place, Burke, Virginia	1/13/00-8/15/01	Condominium	72
9909 Manet Road, Burke, Virginia	3/1/00-9/15/01	House	53
2854 Pine Spring Road, Falls Church, Virginia	1/13/00-8/23/01	Townhouse	41
11128 Rock Garden Drive, Fairfax, Virginia	2/25/00-6/23/01	Townhouse	34
6301 Stevenson Ave., #1317, Alexandria, Virginia	3/29/00-8/30/01	Apartment	32
10009 Park Woods Lane, Burke, Virginia	3/1/00-3/26/01	House	29
4501 S. 31 st Street, Arlington, Virginia	8/30/00-7/9/01	Apartment	21
6316 Meeting House Way, Alexandria, Virginia	3/27/00-4/28/01	Townhouse	20

278. I believe that most if not all of these DL51s Warong certified were fraudulent for the following reasons. First, because these addresses are single-family

condominiums, townhouses, houses, or apartments, it is inconceivable that all the applicants listed on the DL51 forms truly were Virginia residents living at the addresses Warong certified. For example, it is extremely unlikely that the eighty-nine individuals Warong certified as living at 7306 Robert Lane, Falls Church, Virginia, all lived there between January 13, 2000, and September 31, 2001. Similarly, it is highly doubtful that seventy-two people actually lived with Warong at 10702 Oakenshaw Court, Burke, Virginia, during the fifteen-month period from January 10, 2000, and June 18, 2001. Second, at the same time Warong was certifying that applicants lived at the addresses above, Sari Tanudjaya, another target, was doing the same thing. Finally, it is quite likely Warong did not actually live at 10702 Oakenshaw Court, Burke, Virginia, as he claimed on all the DL51 forms. On the contrary, on January 24, 2001, Warong told an asylum officer that his address was 3301 Norshire Court, Bowie, Maryland, and presented the officer his Maryland driver's license showing the same address.

Evidence of Identification Document Fraud Committed by Sari Tanudjaya

279. Between July 21, 2000, and September 11, 2001, Sari Tanudjaya signed two hundred and sixty-one DL51 forms on behalf of immigrants seeking Virginia driver's licenses and identification cards. (I have compared Tanudjaya's signature on these forms with a known example of her signature and the overwhelming majority match. The remainder appear to be forgeries by Albert Warong.) All of these DL51s were submitted to the DMV at various DMV offices in Fairfax County, Virginia, and in nearly every instance resulted in the issuance of a Virginia driver's license or identification card to the immigrant applicant. In all two hundred and sixty-one DL51 forms, Tanudjaya certified that she was personally acquainted with the applicant and that the applicant actually lived

at the Virginia address the applicant listed as his principal residence. On all but two or three of the same forms, Tanudjaya stated that she lived at 10702 Oakenshaw Court, Burke, Virginia. As proof of her identity, Tanudjaya listed her DMV identification number, T66-06-2593, on each DL51 form.

280. Because Tanudjaya filed so many fraudulent DL51s I will not review each and every one here. Rather, I offer the following chart that summarizes the bulk of her certifications during the time in question.

Address of the Applicant as Certified by Tanudjaya	Dates Certified	Type of Building	Number of Applicants
7306 Robert Lane, Falls Church, Virginia	12/05/00-8/28/01	Townhouse	30
10702 Oakenshaw Court, Burke, Virginia	7/24/00-6/18/01	House	37
9167 Broken Oak Place, Burke, Virginia	7/22/00-8/27/01	Condominium	31
9909 Manet Road, Burke, Virginia	7/22/00-4/28/01	House	25
2854 Pine Spring Road, Falls Church, Virginia	8/24/00-9/11/01	Townhouse	24
11128 Rock Garden Drive, Fairfax, Virginia	7/29/00-8/11/01	Townhouse	32
6301 Stevenson Ave., #1317, Alexandria, Virginia	11/13/00-7/28/01	Apartment	20
10009 Park Woods Lane, Burke, Virginia	7/21/00-12/29/00	House	11
4501 S. 31 st Street, #101, Arlington, Virginia	9/12/01-6/23/01	Apartment	17
6316 Meeting House Way, Alexandria, Virginia	8/10/00-4/28/01	Townhouse	11

281. I believe that most if not all of these DL51s Tanudjaya certified were fraudulent for the following reasons. First, because these addresses are single-family condominiums, townhouses, houses, or apartments, it is inconceivable that all the applicants listed on the DL51 forms truly were Virginia residents living at the addresses Tanudjaya certified. For example, it is extremely unlikely the that thirty-seven individuals Tanudjaya certified as living at 10702 Oakenshaw Court, Burke, Virginia, during the eleventh-month period from July 24, 2000, and June 18, 2001, really did so.

This is particularly so, given that Tanudjaya claimed that same address as her residence, as did Albert Warong and seventy-two applicants Warong certified (see above). Second, at the same time Tanudjaya was certifying that applicants lived at the addresses above, Albert Warong, was doing the same thing. Finally, I have my doubts Tanudjaya actually lived at 10702 Oakenshaw Court, Burke, Virginia, during the entire time she claimed on the DL51 forms. I say this because on June 4, 2001, Tanudjaya applied for a social security account number. On her application, Tanudjaya gave her address as 27 School Drive, Apartment 102, Gaithersburg, Maryland.

Evidence of Identification Document Fraud Committed by Johannis Ticoalu

282. Between March 10, 2000, and July 24, 2001, Johannis Ticoalu signed one hundred fifty-nine DL51 forms on behalf of immigrants seeking Virginia driver's licenses and identification cards. (I have compared Ticoalu's signature on these forms with a known example of his signature and the overwhelming majority match.) All of these DL51s were submitted to the DMV at various DMV offices in Fairfax County, Virginia, and in nearly every instance resulted in the issuance of a Virginia driver's license or identification card to the immigrant applicant. In all one hundred fifty-nine DL51 forms, Ticoalu certified that he was personally acquainted with the applicant and that the applicant actually lived at the Virginia address the applicant listed as his principal residence. On all but two of the same forms, Ticoalu stated that he lived at 6369 Silver Ridge Circle, Alexandria, Virginia, his true address. On the remaining two, he claimed to live at 6465 Rockshire Street, Alexandria, Virginia. As proof of his identity, Ticoalu listed his DMV identification number, 618-50-0702, on each DL51 form.

283. Because Ticoalu filed so many fraudulent DL51s I will not review each and every one here. Rather, I offer the following chart that summarizes the bulk of his certifications during the time in question.

Address of the Applicant as Certified by Ticoalu	Dates Certified	Type of Building	Number of Applicants
6369 Silver Ridge Circle, Alexandria, Virginia	3/10/00-7/24/01	Townhouse	82
6465 Rockshire Street, Alexandria, Virginia	5/1/00-2/28/01	Townhouse	49
350 South Van Dorn Street, Alexandria, Virginia	4/23/01-6/6/01	Apartment	15
3200 Shandwick Place, #201, Fairfax, Virginia	4/12/01-4/28/01	Condominium	6

284. I believe that most if not all of these DL51s Ticoalu certified were fraudulent for the following reasons. First, because these addresses are single-family condominiums, townhouses, or apartments, it is inconceivable that all the applicants listed on the DL51 forms truly were Virginia residents living at the addresses Ticoalu certified. In particular, it is extremely unlikely that eighty-two individuals lived at 6369 Silver Ridge Circle, Alexandria, Virginia, with Ticoalu in a span of fourteen months. Similarly, it is very doubtful forty-nine applicants really lived at 6465 Rockshire Street, Alexandria, Virginia, during a nine-month period as Ticoalu claimed. Second, I know that Ticoalu's claim on two of the DL51s that he lived at 6465 Rockshire Street is false. As he noted on all of the other DL51s he certified, Ticoalu's true address at the time was 6369 Silver Ridge Circle.

Evidence of Identification Document Fraud Committed by Megawaty Gandasaputra

285. Between July 1, 2000, and September 17, 2001, Megawaty Gandasaputra signed three hundred sixty DL51 forms on behalf of immigrants seeking Virginia driver's licenses and identification cards. (I have compared Gandasaputra's signature on these

forms with a known example of his signature and the overwhelming majority match.) All of these DL51s were submitted to the DMV at various DMV offices within the Eastern District of Virginia, including several offices in Fairfax and Arlington Counties, and in nearly every instance resulted in the issuance of a Virginia driver's license or identification card to the immigrant applicant. In all three hundred sixty DL51 forms, Gandasaputra certified that she was personally acquainted with the applicant and that the applicant actually lived at the Virginia address the applicant listed as his principal residence. As proof of her identity, Gandasaputra listed her DMV identification number, 620-96-9917, on each DL51 form.

286. Because Gandasaputra filed so many fraudulent DL51s I will not review each and every one here. Rather, I offer the following chart that summarizes the bulk of her certifications during the time in question.

Address of the Applicant as Certified by Megawaty Gandasaputra	Type of Building	Gandasaputra's Stated Address	Number of Applicants	Dates Certified
5506 Great Tree Court, Fairfax, Virginia	House	5506 Great Tree Court, Fairfax, Virginia	86	9/12/00-2/10/01
9346 Campbell Road, Vienna, Virginia	House	9346 Campbell Road, Vienna, Virginia	83	6/6/01-9/17/01
4904 King Richard Drive, Annandale, Virginia	House	4904 King Richard Drive, Annandale, Virginia	73	12/9/00-8/18/01
6003 Captain Marr Court, Fairfax Station, Virginia	House	6003 Captain Marr Court, Fairfax Station, Virginia	61	7/30/01-9/17/01
10807 Oak Wilds Court, Burke, Virginia	House	10807 Oak Wilds Court, Burke, Virginia	46	2/26/01-5/21/01

287. I believe that most if not all of these DL51s Gandasaputra certified were fraudulent for the following reasons. First, because these addresses are single-family houses, it is inconceivable that all the applicants listed on the DL51 forms truly were Virginia residents living at the addresses Gandasaputra certified. Second, as the above

chart shows, Gandasaputra was claiming to live at multiple addresses at once. Finally, at the same time Gandasaputra was certifying that applicants were living at 5506 Great Tree Court and 10807 Oak Wilds Court, several other targets were doing the same. For example, Jenny Gandasaputra, Herman Tanudjaya, and Raymond Marschall collectively certified that another two hundred thirteen applicants lived at Great Tree Court, while Irawan Muljadi certified that another thirty-six applicants lived at Oak Wilds Court.

Evidence of Identification Document Fraud Committed by Nany Kumala

288. Between February 26, 2000, and November 11, 2000, Nany Kumala signed twenty-three DL-51 forms on behalf of immigrants seeking Virginia driver's licenses and identification cards. (I have compared Kumala's signature on these forms with a known example of her signature and determined they match.) All of these DL51s were submitted to the DMV at various DMV offices within the Eastern District of Virginia and in nearly every instance resulted in the issuance of a Virginia driver's license or identification card to the immigrant applicant. In all twenty-three DL51 forms, Kumala certified that she was personally acquainted with the applicant and that the applicant actually lived at the Virginia address the applicant listed as his principal residence. As proof of her identity, Kumala listed her DMV identification number, T66-14-3958, on each DL51 form.

289. On all twenty-three forms, Kumala certified that the applicant lived at 10079 Chestnut Wood Lane, Burke, Virginia. On the first sixteen of these forms filed between February and September, Kumala stated that she too lived at the same address, but gave wildly inconsistent accounts of the amount of time she had lived there—from as little as four months to as much as two years. On the remaining seven filed in October

and November, Kumala stated that she lived at 10206 Chase Commons Drive, Burke, Virginia.

290. I believe that most if not all of the twenty-three DL51s Kumala certified were fraudulent for the following reasons. First, 10079 Chestnut Wood Lane, Burke, Virginia, is a residence, not an apartment building. As a result, it is inconceivable that all twenty-three of the applicants truly lived at 10079 Chestnut Wood Lane, Burke, Virginia, in the same year as the forms claim. Second, at the same time Kumala was certifying that twenty-three applicants lived at 10079 Chestnut Wood Lane, several other targets were doing the same. Indeed, Hans Gouw, Isnayanti Gouw, and Johnson Aliffin certified that another two hundred ninety-two applicants lived at the same address. Finally, I know that Kumala falsely certified DL51 forms for CW-1 and CW-2 on July 13, 2000, at the Fair Oaks DMV office in Fairfax County, Virginia. Kumala certified these DL51 forms in support of CW-1 and CW-2's applications for Virginia identification cards, which cards CW-1 and CW-2 received that same day at the Fair Oaks DMV office. In particular, I know that Kumala falsely stated on CW-1 and CW-2's DL51 forms that CW-1 and CW-2's principle residence was 10079 Chestnut Wood Lane, Burke, Virginia, when in fact Kumala knew that CW-1 and CW-2 lived in California.

Evidence of Identification Document Fraud Committed by Brigitta Parera

291. I have reviewed DMV records concerning Brigitta Parera and discovered that she has obtained Virginia driver's licenses and identification cards in three different names: Brigitta Parera, Brigitta Laibahas, and Maria Yohana. The DMV records for Brigitta Parera and Brigitta Laibahas are under a single customer number and DMV is aware that Brigitta Parera and Brigitta Laibahas are the same person. DMV is not aware,

however, that Maria Yohana is the same person. Indeed, the DMV record for Yohana is under a different customer number with a different date of birth, and it is clear that Parera applied for and received an identification card and a driver's license under the name Maria Yohana by fraud.

292. On December 29, 1999, Brigitta Parera applied for and received a Virginia learner's permit at the Westfields DMV office in Fairfax, Virginia. On her application, Parera listed her date of birth as July 20, 1969, and her social security number as 602-66-5311. On June 23, 2000, Parera applied for and received a driver's license in the name of Brigitta Laibahas at the Fair Oaks DMV office in Fairfax, Virginia. On this application, Parera listed her date of birth as July 20, 1969, gave her social security number as 602-66-5311, and notified DMV of her change of name.

293. On April 21, 2001, Parera applied for and received a Virginia identification card and a learner's permit at the Westfields DMV office in Fairfax, Virginia. On her applications, Parera stated her name was Maria Yohana and that her date of birth was July 20, 1965. No mention was made on either application of a name change. On November 22, 2003, Parera applied for and received a Virginia driver's license at the Fair Oaks DMV office in Fairfax, Virginia. On this application, Parera stated her name was Maria Yohana, that her date of birth was July 20, 1965, and that her social security number was 227-93-7660.

294. I have compared the color photograph the DMV took of the applicant who submitted the four applications described above. The photographs all depict the same person, namely Brigitta Parera.

VII. SOCIAL SECURITY FRAUD

295. A social security card is a document issued by the Social Security Administration (hereinafter SSA) to individuals in the United States as proof that the individual has a social security account and account number. A legitimate social security account number is unique and issued to only one individual.

296. My investigation has revealed that Hans Gouw, Brigitta Parera, and Silvy Karageorge have each obtained multiple social security account numbers by fraud. In particular, all three targets have obtained an additional social security account number from the SSA without disclosing the fact that they already possessed a number.

Hans Gouw

297. According to SSA records, Hans Gouw first applied for a social security account number on April 28, 1995, in California. On his application, Gouw gave his name as Liong Hoat Gouw; his date of birth as March 12, 1951; and his place of birth as Jakarta, Indonesia. He listed his father's name as Thoan H. Gouw and his mother's name as Souw Y. Nio. The SSA approved this application and issued Gouw social security account number 603-82-4095.

298. On September 3, 1999, Gouw applied for a second social security account number in Fairfax, Virginia. On this application, Gouw gave his name as Liong Hoat Gouw; his date of birth as March 12, 1951; and his place of birth as Jakarta, Indonesia. He listed his father's name as Tjoan Gouw and his mother's name as Sofiah Gandasaputra. He also falsely stated that he had never filed for or received a social security account number before. The SSA approved this application and issued Gouw social security account number 224-85-4722.

299. I know for several reasons that the Hans Gouw who applied for these two numbers is the same person and is the Hans Gouw I am investigating. First, the applicant used the same name, date of birth, and place of birth on both applications. Second, the name of the applicant's father is essentially the same on both applications. Third, I have compared the applicant's signature on both applications and determined that they match. Finally, I have further compared the signatures on both applications with known signatures made by Hans Gouw when using the name Liong Hoat Gouw and determined that these signatures all match as well.

300. Gouw has used social security account number 224-85-4722—the second number he had obtained by false statement—to obtain numerous credit lines, loans, and bank accounts over the past three years. For example, on October 6, 2003, Gouw applied for a residential loan from ALDA Home Mortgage in Annandale, Virginia. The loan application sought a mortgage of \$594,900 for the purchase of 6155 Pohick Station Drive, Fairfax Station, Virginia. On this application, which Gouw signed and submitted in person at ALDA Home Mortgage, Gouw listed his social security account number as 224-85-4722.

Brigitta Parera

301. According to SSA records, Brigitta Parera first applied for a social security account number on June 11, 1993, in California. On her application, Parera gave her name as Brigitta Mercy Parera; her date of birth as July 20, 1969; and her place of birth as Jakarta, Indonesia. She listed her father's name as Frederick Parera and her mother's name as Deetje Theodore Uway. The SSA approved this application and issued Parera social security account number 602-66-5311.

302. On May 14, 2002, Parera applied for a second social security account number in Fairfax, Virginia. On this application, Parera gave her name as Maria Yohana; her date of birth as July 20, 1965; and her place of birth as Jakarta, Indonesia. She listed her father's name as Frederick Parera and her mother's name as Elenonora Theodora Uway. She also falsely stated that she had never filed for or received a social security account number before. The SSA approved this application and issued Parera social security account number 227-93-7660.

303. On November 22, 2003, Parera used social security account number 227-93-7660—the second number she had obtained by false statement—to apply for and receive a Virginia driver's license at the Fair Oaks DMV office in Fairfax, Virginia. On her application, Parera listed her name as Maria Yohana and her date of birth as July 20, 1965. When asked to list her social security account number, Parera listed it as 227-93-7660. She also presented a social security card to the DMV clerk bearing that number.

304. I know for several reasons that the Brigitta Parera who applied for the first social security account number and whom I am investigating is the same person as the Maria Yohana who obtained the second social security account number. First, the applicant on the first application used the same place of birth and father's name as the applicant on the second application. Second, the dates of birth are similar and differ only in year: July 20, 1969, versus July 20, 1965. Third, the names of the applicants' mothers are similar: Deetje Theodore Uway and Elenonora Theodora Uway. Fourth, I know that the Maria Yohana who used 227-93-7660 to obtain a Virginia driver's license on November 22, 2003, is in fact Brigitta Parera because I have compared known pictures of

Parera with the photograph on Yohana's license and determined that they depict the same person.

Silvy Karageorge

305. According to SSA records, Silvy Karageorge first applied for a social security account number on July 22, 1984, in Maryland. On her application, Karageorge gave her name as Silvy Walujo; her date of birth as December 29, 1956; and her place of birth as Jakarta, Indonesia. She listed her father's name as Izak T. Tjandratana and her mother's name as Yeetjek Katarina. The SSA approved this application and issued Karageorge social security account number 215-06-0526.

306. On July 23, 1986, Karageorge applied for a second social security account number in Washington, D.C. On this application, Karageorge gave her name as Silvy Rodriguez; her date of birth as December 29, 1956; and her place of birth as Jakarta, Indonesia. She listed her father's name as Izaak Tjandratana and her mother's name as Yeetje Chatrina. She also falsely stated that she had never filed for or received a social security account number before. The SSA approved this application and issued Karageorge social security account number 223-39-3106.

307. On August 6, 1986, Karageorge applied for a replacement card for social security account number 223-39-3106 in Alexandria, Virginia. On this application, Karageorge used the name Silvy Rodriguez but clarified that her birth name was Silvy Tjandratana. On October 6, 1986, Karageorge applied for another replacement card for social security account number 223-39-3106 in Alexandria, Virginia. On this application, Karageorge used the name Silvy Rodriguez, but added that she had a third name, Silvy Walujo, in addition to her birth name of Silvy Tjandratana. On March 5,

1999, Karageorge applied for another replacement card for social security account number 223-39-3106 in Arlington, Virginia. On this application, Karageorge changed the name to be shown on her card to Silvy Karageorge, but stated that her birth name was Silvy Walujo.

308. On August 1, 2002, Karageorge used social security account number 223-39-3106—the second number she had obtained by false statement—to apply for and receive a Virginia driver's license at the Fair Oaks DMV office in Fair Oaks, Virginia. On her application, Karageorge listed her name as Silvy Karageorge and her date of birth as December 29, 1956.

309. I know for several reasons that the Silvy Walujo who applied for the first social security account number and the Silvy Rodriguez, later Karageorge, who applied for the second number, are in fact the same person and are the Silvy Karageorge I am investigating. First, the applicant on the first application used the same date of birth, place of birth, and parent names as the applicant on the second and following applications. Second, the second applicant, Silvy Rodriguez, acknowledges on her March 5, 1999, application that her birth name was Silvy Walujo, the name of the first applicant. Third, I know that the address on the license Karageorge obtained on August 1, 2002, using social security account number 223-39-3106 is 7800 Delano Court, Manassas, Virginia—the address of the Silvy Karageorge I am investigating.

VIII. MONEY LAUNDERING

Hans Gouw

310. As a result of my investigation, I know that Hans Gouw has controlled and run CIAS since at least 2000. I further know that under Gouw's direction CIAS has

become a corrupt enterprise with few legitimate activities. Indeed, Gouw and his associates have used CIAS as a vehicle to carry on numerous specified unlawful activities, as that term is defined at 18 U.S.C. § 1956(c)(7), including violations of 8 U.S.C. § 1324 and 18 U.S.C. §§ 1028, 1341, 1542, and 1546.

311. I also know that Gouw has used at least two accounts to deposit the illegal proceeds he has derived through CIAS. Gouw opened the first account at Chevy Chase Bank in April 2000. The account is in the name of CIAS, Inc., and bears the number 1544301456. The sole registered user of this account is Liong Gouw and the address of record is 6155 Pohick Station Drive, Fairfax Station, Virginia. Gouw opened the second account at First Union Bank in February 2002. The account is in the name of Liong Gouw and bears the number 1010052125579. The sole registered user of this account is Liong Gouw and the address of record is 6155 Pohick Station Drive, Fairfax Station, Virginia.

312. The records for these two accounts reveal that Gouw has deposited substantial sums of money into the accounts during their recent existence, which deposits are summarized from the years 2001 through 2003, in the chart below.

Account	Year	Check Deposits	Cash Deposits	Money Order Deposits	Total Deposits
Chevy Chase (CIAS, Inc.)	2001	\$251,401	\$6,700	\$99,467	\$391,561
Chevy Chase (CIAS, Inc.)	2002	\$36,063	\$7,100	\$24,375	\$75,550
Chevy Chase (CIAS, Inc.)	2003	\$46,155	\$3,500	\$23,524	\$80,049
First Union (Liong Gouw)	2002	\$97,246	\$26,450	\$57,095	\$178,138
First Union (Liong Gouw)	2003	\$326,506	\$51,100	\$203,985	\$582,865

Interestingly, Gouw claimed very little legitimate income on his federal tax returns for 2001 and 2002, and CIAS filed no returns for those years at all. On his 2001 tax return

Gouw claimed \$5,125 in gross income; in 2002 he claimed \$11,390; and in 2003 he claimed \$13,661. This despite the fact that these accounts show total deposits of \$391,561 in 2001, \$253,688 in 2002, and \$662,914 in 2003.

313. I believe these two accounts are the principal repository of the illegal fees Gouw and his associates have generated through CIAS. I say this for two reasons, first the account records clearly show that the two accounts are devoted to deposits from CIAS. The deposits into the accounts are frequent and consist of cash, money order, and check deposits. The checks deposited usually bear notations such as “asylum,” “asylum fee,” “asylum application,” “immigration application,” “membership fee,” and “birth certificate.” Second, numerous deposits into the account consist of funds tied to known illegal activity. For example, on April 9, 2001, Gouw deposited a \$1,100 check into the CIAS account at Chevy Chase Bank. This check was written to Gouw by Judy Doe (an Indonesian alien) as payment to Gouw for a fraudulent asylum application. Similarly, on or about June 18, 2003, Gouw deposited a \$1,000 money order into his account at First Union Bank. This money order was written to Gouw by CI-4 as partial payment for the fraudulent asylum application Gouw and his associates prepared and filed for CI-4.

314. Gouw has used the illegal proceeds in these accounts to promote the continued illegal activities of CIAS by, among other things, paying for the advertisements CIAS places in *Indonesian Journal* and *Indonesia Media*. For example, on August 5, 2003, a check in the amount of \$600 was written on the CIAS account and made payable to *Indonesian Journal*. The check is signed by Hans Gouw and bears the notation “Aug, 03 ads Re CIAS.” The June 2003, *Indonesian Journal* magazine includes an advertisement for CIAS. This advertisement features a large picture of 6155 Pohick

Station Drive and states that CIAS can help Indonesian immigrants “to get legal status in America.” Interested immigrants are urged to call targets “Lestari” [Nugroho], “Herlina” [Suherman], and “Jenny” [Gandasaputra]. Similarly, on August 12, 2003, a check in the amount of \$600 was written on the CIAS account and made payable to *Indonesia Media*. The check is signed by Hans Gouw and bears the notation “for Sept 03 ads.” The August 2003, *Indonesia Media* magazine includes an advertisement for CIAS. This advertisement also features a picture of 6155 Pohick Station Drive and states that CIAS can help Indonesian immigrants “to get legal status in America.” Interested immigrants are urged to call targets “Lestari Nugroho,” “Herlina Suherman,” and “Jenny” [Gandasaputra].

Megawaty Gandasaputra and Michael Wright

315. As a result of my investigation, I know that Megawaty Gandasaputra and Michael Wright have controlled and run AAPS since at least 2001. I further know that under their direction AAPS has become a corrupt enterprise with few legitimate activities. Indeed, Gandasaputra and Wright have used AAPS as a vehicle to carry on numerous specified unlawful activities, as that term is defined at 18 U.S.C. § 1956(c)(7), including violations of 8 U.S.C. § 1324 and 18 U.S.C. §§ 1028, 1341, and 1546. I also know that Gandasaputra and Wright have maintained a joint account at Chevy Chase Bank (account number 093-324798-2) in their respective names since March 2001. Gandasaputra and Wright are the sole registered users of this account and the address of record is 6003 Captain Marr Court, Fairfax Station, Virginia.

316. The records for this account reveal that Gandasaputra and Wright have deposited substantial sums of money into the account during its recent existence, which deposits are summarized from January 1, 2001, through July 31, 2003, in the chart below.

Account	Year	Check Deposits	Cash Deposits	Money Order Deposits	Total Deposits
Chevy Chase	2001	\$77,007	\$80,650	\$65,023	\$224,153
Chevy Chase	2002	\$69,433	\$45,278	\$247,285	\$365,548
Chevy Chase (Jan.-Jul.)	2003	\$54,915	\$10,700	\$145,426	\$211,574

Interestingly, Gandasaputra and Wright claimed very little legitimate income on their federal tax returns for 2001 through 2003, and AAPS filed no returns for those years at all. In 2001, Gandasaputra claimed \$13,197 in gross income on her tax return, while Wright claimed \$23,828 on his. In 2002, Gandasaputra claimed \$23,758 and Wright claimed \$4,864. In 2003, Gandasaputra claimed \$21,360, and Wright claimed \$1,445. This despite the fact that their joint Chevy Chase account shows total deposits of \$224,153 in 2001, \$365,548 in 2002, and \$211,574 in the first seven months of 2003.

317. I believe this Chevy Chase account is the principal repository of the illegal fees Gandasaputra and Wright have generated through AAPS. I say this for two reasons, first the account records clearly show that the account receives frequent deposits of cash, money orders, and checks. While the checks typically don't bear notations, they are almost exclusively from persons who appear to be immigrants. Second, numerous deposits into the account consist of funds tied to known illegal activity. For example, on May 28, 2003, Gandasaputra deposited \$4,150 in Postal Service money orders into this account. These money orders were written to Gandasaputra by CI-6 as payment for the fraudulent asylum application Gandasaputra prepared and filed for CI-6's wife, CI-7.

318. Gandasaputra and Wright use the illegal proceeds in their Chevy Chase account to promote the continued illegal activities of AAPS by, among other things, paying for the advertisements AAPS places in *Indonesian Journal* and *Indonesia Media*. For example, on March 24, 2003, a check in the amount of \$300 was written on this account and made payable to *Indonesian Journal*. The check is signed by Michael Wright. The March 2003, *Indonesian Journal* magazine includes an advertisement for AAPS. This advertisement highlights AAPS' many immigration services and claims that AAPS can obtain legal documents and status for Indonesians illegally in the United States. Interested parties are told to call Gandasaputra or Wright. Similarly, on March 10, 2003, a check in the amount of \$300 was written on this account and made payable to *Indonesia Media*. The check is signed by Michael Wright. The March 2003 *Indonesia Media* magazine includes an advertisement for AAPS. This advertisement is identical to the one in the March edition of *Indonesian Journal*.

IX. AUTHORITY TO SEARCH FOR EVIDENCE

Authority to Search For and Seize Evidence and Proceeds of Illegal Activity

319. In general terms, I seek authority to search for documents, monies, and other evidence related to the above-described crimes. The specific documents, monies, and other evidence I seek to search for and seize in each location are more fully described in attachments B1 through B7. To aid in the search for monies, I intend to use dogs trained in the detection of U.S. currency.

320. Based on my experience as an agent, I know that organizations and businesses such as CIAS, AAPS, CIPCS, KN, and PI produce and maintain records relating to their activities at their principal sites of operation. These records include

employment records, tax records, financial records, payment records, and customer records. I also know that organizations and businesses tend to retain such records for long periods of time. This is particularly true in situations where, as here, the activities of the organizations and businesses center around government benefit programs that (1) have lengthy application and appeals processes and (2) provide government benefits of great importance to the recipients, such as lawful immigration status, work authorization, U.S. passports, social security cards, and driver's licenses.

321. I also know that individuals tend to retain on their person and in their homes documents and records of great personal significance. These include documents and records concerning identity, immigration status, citizenship, employment, retirement, personal finances, social security benefits, and property ownership or rental.

322. I also know that criminals often store illegally obtained monies in their homes. They do this because they do not wish to create the record that a traditional deposit in a commercial bank creates and wish to have ready, unrestricted access to their monies. This is particularly true in cases, such as this one, in which the bulk of the illegal transactions at issue are being conducted in cash or money orders.

Probable Cause to Search 6155 Pohick Station Drive, Fairfax Station, Virginia

323. As shown above, I know that 6155 Pohick Station Drive, Fairfax Station, Virginia, is the residence of Hans and Isnayanti Gouw and the active headquarters of CIAS. I also know that it is (1) the principal site from which Hans Gouw and his associates at CIAS have committed most of their crimes since December 2000; (2) a physical address that figures prominently in many of the fraudulent CIAS applications I

have described in this affidavit, namely asylum applications, labor certification applications, and Virginia DMV residency certifications; (3) a likely repository of records concerning CIAS's operation, finances, and ownership; and (4) the likely repository of records and documents relating to the Gouws' activities, including their ownership and operation of CIAS, their social security records, their personal financial records, their contacts and relationships with other targets, their ownership or rental of properties, and their personal immigration records.

324. As a result, I have probable cause to believe that 6155 Pohick Station Drive is a likely repository of evidence, fruits, and instruments of the various crimes committed by Hans Gouw, Isnayanti Gouw, and the other targets named in this affidavit who work for or assist Hans Gouw through CIAS. In particular, I believe 6155 Pohick Station Drive holds items related to (1) Hans Gouw and his CIAS associates' efforts to sell, prepare, and file fraudulent applications for asylum, in violation of 8 U.S.C. §§ 1324(a)(1) and 1324c(e), and 18 U.S.C. §§ 371, 1001, 1341, and 1546(a); (2) Hans Gouw's efforts to sell, prepare, and file fraudulent applications for labor certification, in violation of 18 U.S.C. §§ 1001 and 1546(a); (3) Hans Gouw's efforts to commit passport fraud, in violation of 18 U.S.C. §§ 371 and 1542; (4) Hans Gouw's misuse of a social security account number, in violation of 42 U.S.C. § 408; (5) Hans Gouw and Isnayanti Gouw's efforts to commit identification document fraud, in violation of 18 U.S.C. § 1028; and (6) Hans Gouw's efforts to promote the continued and illegal activities of CIAS, in violation of 18 U.S.C. § 1956(a).

Probable Cause to Search 6551 Loisdale Court, Suite 115, Springfield, Virginia

325. As shown above, I know that 6551 Loisdale Road, Suite 115, Springfield, Virginia, is the present office of AAPS. I also know that it is (1) the principal site from which Megawaty Gandasaputra and Michael Wright have operated AAPS since July 2003, (2) the location at which Megawaty Gandasaputra, CI-6, and CI-7 met on August 12, 2003, to practice for CI-6 and CI-7's asylum interview, and (3) a likely repository of records concerning AAPS's operation, finances, and ownership.

326. As a result, I have probable cause to believe that 6551 Loisdale Road, Suite 115, is a likely repository of evidence, fruits, and instruments of the various crimes committed by Megawaty Gandasaputra and Michael Wright through AAPS. In particular, I believe 6551 Loisdale Road, Suite 115, holds items related to (1) Megawaty Gandasaputra's efforts to sell, prepare, and file fraudulent applications for asylum, in violation of 8 U.S.C. §§ 1324(a)(1) and 1324c(e), and 18 U.S.C. §§ 371, 1001, 1341, and 1546(a); (2) Michael Wright's efforts to sell, prepare, and file fraudulent applications for labor certification, in violation of 18 U.S.C. §§ 1001 and 1546(a); (3) Megawaty Gandasaputra's efforts to commit identification document fraud, in violation of 18 U.S.C. § 1028; and (4) Megawaty Gandasaputra and Michael Wright's efforts to promote the continued and illegal activities of AAPS, in violation of 18 U.S.C. § 1956(a).

Probable Cause to Search 6003 Captain Marr Court, Fairfax Station, Virginia

327. As shown above, I know that 6003 Captain Marr Court, Fairfax Station, Virginia, is the present home of Megawaty Gandasaputra and Michael Wright and was the office of AAPS until July 2003. I also know that it is (1) the purported location of

employment for the sixteen fraudulent labor certification applications now pending before the Department of Labor that Michael Wright prepared through AAPS; (2) the address of record for sixty-one applicants for Virginia driver's licenses or identification cards whose Virginia address Megawaty Gandasaputra certified; and (3) the likely repository of records and documents relating to Megawaty Gandasaputra and Michael Wright's activities, including their ownership and operation of AAPS, their personal financial records, their contacts and relationships with other targets, their ownership or rental of properties, and Megawaty Gandasaputra's personal immigration records.

328. As a result, I have probable cause to believe that 6003 Captain Marr Court is a likely repository of evidence, fruits, and instruments of the various crimes committed by Megawaty Gandasaputra and Michael Wright. In particular, I believe 6003 Captain Marr Court holds items related to (1) Megawaty Gandasaputra's efforts to sell, prepare, and file fraudulent applications for asylum, in violation of 8 U.S.C. §§ 1324(a)(1) and 1324c(e), and 18 U.S.C. §§ 371, 1001, 1341, and 1546(a); (2) Michael Wright's efforts to sell, prepare, and file fraudulent applications for labor certification, in violation of 18 U.S.C. §§ 1001 and 1546(a); (3) Megawaty Gandasaputra's efforts to commit identification document fraud, in violation of 18 U.S.C. § 1028; and (4) Megawaty Gandasaputra and Michael Wright's efforts to promote the continued and illegal activities of AAPS, in violation of 18 U.S.C. § 1956(a).

Probable Cause to Search 7800 Delano Court, Manassas, Virginia

329. As shown above, I know that 7800 Delano Court, Manassas, Virginia, is Silvy Karageorge's present residence and the main office of CIPCS. I also know that it is

(1) the principal and advertised location of CIPCS; (2) the location at which CI-11 and Karageorge met on November 3, 2004, to practice for CI-11's asylum interview; and (3) the likely repository of records and documents relating to Karageorge and CIPCS's activities, including her ownership and operation of CIPCS, her social security records, her personal financial records, her contacts and relationships with other targets, her ownership or rental of properties, and her personal immigration records.

330. As a result, I have probable cause to believe that 7800 Delano Court is a likely repository of evidence, fruits, and instruments of the various crimes committed by Silvy Karageorge. In particular, I believe 7800 Delano Court holds items related to (1) Silvy Karageorge's efforts to sell, prepare, and file fraudulent applications for asylum, in violation of 8 U.S.C. §§ 1324(a)(1) and 1324c(e), and 18 U.S.C. §§ 371, 1001, 1341, and 1546(a); and (2) Silvy Karageorge's misuse of a social security account number, in violation of 42 U.S.C. § 408.

Probable Cause to Search 6308 Torrence Street, Burke, Virginia

331. As shown above, I know that 6308 Torrence Street, Burke, Virginia, is the residence of Nany Kumala and the present office of KN. I also know that it is (1) the principal location of KN; (2) the location at which CI-8 and Kumala met on October 13, 2004, to discuss the status of his and CI-2's cases; and (3) the likely repository of records and documents relating to Kumala and KN's activities, including Kumala's ownership and operation of KN, her personal financial records, her contacts and relationships with other targets, her ownership or rental of properties, and her personal immigration records.

332. As a result, I have probable cause to believe that 6308 Torrence Street is a likely repository of evidence, fruits, and instruments of the various crimes committed by Nany Kumala through KN. In particular, I believe 6308 Torrence Street holds items related to (1) Kumala's efforts to sell, prepare, and file fraudulent applications for asylum, in violation of 8 U.S.C. §§ 1324(a)(1) and 1324c(e), and 18 U.S.C. §§ 371, 1001, 1341, and 1546(a); (2) Kumala's efforts to sell, prepare, and file fraudulent applications for labor certification, in violation of 18 U.S.C. §§ 1001 and 1546(a); and (3) Kumala's efforts to commit identification document fraud, in violation of 18 U.S.C. § 1028.

Probable Cause to Search 10079 Chestnut Wood Lane, Burke, Virginia

333. As shown above, I know that Hans Gouw, Isnayanti Gouw, Johnson Aliffin, and Nany Kumala certified on approximately 300 Virginia DMV residency certifications that the immigrant applicant on the certification lived at 10079 Chestnut Wood Lane, Burke, Virginia. The approximately 300 applicants then used the certifications to obtain a Virginia driver's license, learner's permit, or identification card. Virginia DMV records show that 119 of these 300 driver's licenses, learner's permits, and identification cards are still valid and list 10079 Chestnut Wood Lane, Burke, Virginia, as the holder's current address of record.

334. As a result, I have probable cause to believe that 10079 Chestnut Wood Lane, Burke, Virginia, is a likely repository of evidence relating to Hans Gouw, Isnayanti Gouw, Johnson Aliffin, and Nany Kumala's efforts to commit identification document fraud to commit identification document fraud, in violation of 18 U.S.C. § 1028. In particular, I believe a search of 10079 Chestnut Wood Lane, Burke, Virginia, will reveal

whether the property is the present Virginia residence of 119 individuals or is, as I believe, a property that has been misused by Hans Gouw, Isnayanti Gouw, Johnson Aliffin, and Nany Kumala to commit fraud on the Virginia DMV.

Probable Cause to Search 5506 Great Tree Court, Fairfax, Virginia

335. As shown above, I know that 5506 Great Tree Court, Fairfax, Virginia, is the present residence of Jenny Gandasaputra and Herman Tanudjaja. It is also the purported office of PI. I also know that it is (1) the principal site from which PI is alleged to operate and the likely repository of records concerning its existence and practices; (2) the purported location of employment listed on the fifteen fraudulent labor certification applications now pending before the Department of Labor that Joandi Gani prepared through PI; (3) the address of record for approximately 300 applicants for Virginia driver's licenses or identification cards whose Virginia address Jenny Gandasaputra, Herman Tanudjaja, Megawaty Gandasaputra, and Raymond Marschall certified; and (4) the likely repository of personal records and documents relating to Gandasaputra's activities, including Gandasaputra's ownership and operation of PI, her contacts and relationships with Gani, Hans Gouw and other targets, her work for CIAS, her personal financial records, her ownership or rental of properties, and her personal immigration records.

336. As a result, I have probable cause to believe that 5506 Great Tree Court, Fairfax, Virginia is a likely repository of evidence, fruits, and instruments of the various crimes committed by Jenny Gandasaputra, Herman Tanudjaja, Joandi Gani, Megawaty Gandasaputra, and Raymond Marschall. In particular, I believe 5506 Great Tree Court

holds items related to (1) Jenny Gandasaputra's efforts to sell, prepare, and file fraudulent applications for asylum, in violation of 8 U.S.C. §§ 1324(a)(1) and 1324c(e), and 18 U.S.C. §§ 371, 1001, 1341, and 1546(a); (2) Joandi Gani's efforts to sell, prepare, and file fraudulent applications for labor certification, in violation of 18 U.S.C. §§ 1001 and 1546(a); and (3) Jenny Gandasaputra, Herman Tanudjaja, Megawaty Gandasaputra, and Raymond Marschall's efforts to commit identification document fraud, in violation of 18 U.S.C. § 1028.

Permission to Search Computers

337. I know that there are computers at CIAS's office at 6155 Pohick Station Drive and at AAPS's office at 6551 Loisdale Road, Suite 115. I also know that the majority of asylum declarations prepared in this case were created using a word processor and thus were almost certainly prepared on a computer. Therefore, I expect to encounter computers during the searches I seek authority to conduct, with the exception of the search of 10079 Chestnut Wood Lane. I further believe that these same computers will contain records and documents that come within the scope of the warrants I am requesting. Therefore, I seek authority to seize for appropriate analysis any computer I encounter during my search of (1) 6155 Pohick Station Drive, Fairfax Station, Virginia; (2) 6551 Loisdale Court, Suite 115, Springfield, Virginia; (3) 6003 Captain Marr Court, Fairfax Station, Virginia; (4) 7800 Delano Court, Manassas, Virginia; (5) 6308 Torrence Street, Burke, Virginia; and (6) 5506 Great Tree Court, Fairfax, Virginia.

338. I know that computer hardware, software, documentation, passwords, and data security devices may be important to a criminal investigation in two distinct and important respects: (1) the objects themselves may be instruments, fruits, or evidence of a

crime, and (2) the objects may have been used to collect and store information about crimes, in the form of electronic data. Rule 41 of the Federal Rules of Criminal Procedure permits the government to search and seize computer hardware, software, documentation, passwords, and data security devices which are (1) instruments, fruits, or evidence of a crime, or (2) storage devices for information about crime.

339. Based upon my training and experience, I know that to completely and accurately retrieve data maintained in computer hardware or on computer software, to ensure accuracy and completeness of such data, and to prevent the loss of the data either from accidental or programmed destruction, it is often necessary that some computer equipment, peripherals, related instructions in the form of manuals and notes, as well as the software utilized to operate such a computer be seized and subsequently processed by a qualified computer specialist in a laboratory setting. Accordingly, I am seeking authorization to seize any computers that may contain evidence of the criminal activity described above, as well as any other peripheral items that may be needed to conduct a proper search of the computers in a controlled environment.

340. I know that computer searches often must be conducted by qualified computer specialists in a laboratory setting because of the following:

a. Computer storage devices (such as hard drives, diskettes, and back-up tapes) can store the equivalent of thousands of pages of information. Additionally, a user may try to conceal criminal evidence by storing it in random order with deceptive file names. This may require searching authorities to examine all of the stored data to determine which particular files are evidence, fruits, and/or instrumentalities of a crime. This

sorting process can take substantial time, depending on the volume of data stored, and it would be impractical to attempt this kind of data search on site.

b. Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert is qualified to analyze the system and its data.

c. Data search protocols are exacting scientific procedures designed to protect the integrity of the evidence and to recover even hidden, erased, compressed, password-protected, or encrypted files. Because electronic evidence is extremely vulnerable to inadvertent or intentional modification or destruction (both from external sources or from destructive code imbedded in the system as a "booby trap"), a controlled environment is essential to its complete and accurate analysis.

X. ENUMERATION OF A SPECIFIC COMPLAINT AGAINST EACH TARGET

Hans Gouw

341. Based on the foregoing, I have probable cause to believe that from in and around July 2000 and continuing through on or about April 4, 2001, in the Eastern District of Virginia, Hans Gouw knowingly subscribed as true, under penalty of perjury, a material and false statement in an Application for Asylum and for Withholding of Removal (form I-589), an application required by the immigration laws and federal regulations prescribed thereunder, and knowingly presented the same, in violation of 18 U.S.C. §§ 2 and 1546(a). Specifically, from in and around July 2000 and continuing through on or about April 4, 2001, in Fairfax and Arlington Counties, Virginia, Hans

Gouw knowingly participated in the preparation of a fraudulent Application for Asylum and for Withholding of Removal (form I-589) on behalf of CW-1 and CW-2 and the subsequent presentation of the same to the Immigration and Naturalization Service.

Isnayanti Gouw

342. I also have probable cause to believe that from on or about May 13, 2003, continuing through on or about October 21, 2003, in the Eastern District of Virginia, Isnayanti Gouw knowingly subscribed as true, under penalty of perjury, a material and false statement in an Application for Asylum and for Withholding of Removal (form I-589), an application required by the immigration laws and federal regulations prescribed thereunder, and knowingly presented the same, in violation of 18 U.S.C. §§ 2 and 1546(a). Specifically, from on or about May 13, 2003, continuing through on or about October 21, 2003, in Fairfax and Arlington Counties, Virginia, Isnayanti Gouw knowingly participated in the preparation of a fraudulent Application for Asylum and for Withholding of Removal (form I-589) on behalf of CI-4 and the subsequent presentation of the same to the Department of Homeland Security.

Jenny Gandasaputra

343. I also have probable cause to believe that from on or about July 14, 2003, and continuing through on or about September 17, 2003, in the Eastern District of Virginia, Jenny Gandasaputra knowingly subscribed as true, under penalty of perjury, a material and false statement in an Application for Asylum and for Withholding of Removal (form I-589), an application required by the immigration laws and federal regulations prescribed thereunder, and knowingly presented the same, in violation of 18 U.S.C. §§ 2 and 1546(a). Specifically, from on or about July 14, 2003, and continuing

through September 17, 2003, in Fairfax and Arlington Counties, Virginia, Jenny Gandasaputra knowingly participated in the preparation of a fraudulent Application for Asylum and for Withholding of Removal (form I-589) on behalf of CI-10 and the subsequent presentation of the same to the Department of Homeland Security.

Herman Tanudjaja

344. I also have probable cause to believe that from on or about November 4, 2000, and continuing through August 18, 2001, in the Eastern District of Virginia, Herman Tanudjaja knowingly conspired to produce Virginia driver's licenses and identification cards without lawful authority when such production would be in or affect interstate or foreign commerce, in violation of 18 U.S.C. § 1028, subsections (a)(1), (b)(1)(A)(ii), (c)(3)(A), and (f). Specifically, from on or about November 4, 2000, and continuing through August 18, 2001, Herman Tanudjaja knowingly conspired with other individuals to prepare and submit false Virginia residency certifications to clerks of the Virginia Department of Motor Vehicles at DMV offices in Fairfax County, Virginia, in order to cause those same clerks to produce Virginia driver's licenses and identification cards in violation of Virginia law.

Johnson Aliffin

345. I also have probable cause to believe that from at least December 1, 1999, continuing through at least July 12, 2001, in the Eastern District of Virginia, Johnson Aliffin knowingly conspired with Hans Gouw and others to commit an offense against the United States and that Johnson Aliffin and his co-conspirators did an act to effect the object of the conspiracy, in violation of 18 U.S.C. §§ 371 and 1546(a). Specifically,

from at least December 1, 1999, continuing through at least July 12, 2001, in Fairfax and Arlington Counties, Virginia, Johnson Aliffin, Hans Gouw, and other CIAS agents and clients knowingly conspired to commit asylum fraud, and did in fact prepare and present fraudulent asylum applications containing false accounts of persecution in furtherance of the same conspiracy.

Ratna Hartanto

346. I also have probable cause to believe that from in and around July 2000 and continuing through on or about April 4, 2001, in the Eastern District of Virginia, Ratna Hartanto knowingly subscribed as true, under penalty of perjury, a material and false statement in an Application for Asylum and for Withholding of Removal (form I-589), an application required by the immigration laws and federal regulations prescribed thereunder, and knowingly presented the same, in violation of 18 U.S.C. §§ 2 and 1546(a). Specifically, from in and around July 2000 and continuing through on or about April 4, 2001, in Fairfax and Arlington Counties, Virginia, Ratna Hartanto knowingly participated in the presentation of a fraudulent Application for Asylum and for Withholding of Removal (form I-589) on behalf of CW-1 and CW-2 to the Immigration and Naturalization Service.

Brigitta Parera

347. I also have probable cause to believe that from on or about July 14, 2003, and continuing through on or about September 17, 2003, in the Eastern District of Virginia, Brigitta Parera knowingly subscribed as true, under penalty of perjury, a material and false statement in an Application for Asylum and for Withholding of Removal (form I-589), an application required by the immigration laws and federal

regulations prescribed thereunder, and knowingly presented the same, in violation of 18 U.S.C. §§ 2 and 1546(a). Specifically, from on or about July 14, 2003, and continuing through September 17, 2003, in Fairfax and Arlington Counties, Virginia, Brigitta Parera knowingly participated in the preparation of a fraudulent Application for Asylum and for Withholding of Removal (form I-589) on behalf of CI-10 and the subsequent presentation of the same to the Department of Homeland Security.

Willy Irsan

348. I also have probable cause to believe that from on or about May 13, 2003, continuing through on or about October 21, 2003, in the Eastern District of Virginia, Willy Irsan knowingly subscribed as true, under penalty of perjury, a material and false statement in an Application for Asylum and for Withholding of Removal (form I-589), an application required by the immigration laws and federal regulations prescribed thereunder, and knowingly presented the same, in violation of 18 U.S.C. §§ 2 and 1546(a). Specifically, from on or about May 13, 2003, continuing through on or about October 21, 2003, in Fairfax and Arlington Counties, Virginia, Willy Irsan knowingly participated in the preparation of a fraudulent Application for Asylum and for Withholding of Removal (form I-589) on behalf of CI-4 and the subsequent presentation of the same to the Department of Homeland Security.

Achnita Supomo

349. I also have probable cause to believe that from on or about July 15, 2003, and continuing through October 21, 2003, in the Eastern District of Virginia, Achnita Supomo knowingly subscribed as true, under penalty of perjury, a material and false statement in an Application for Asylum and for Withholding of Removal (form I-589),

an application required by the immigration laws and federal regulations prescribed thereunder, and knowingly presented the same, in violation of 18 U.S.C. §§ 2 and 1546(a). Specifically, from on or about July 15, 2003, and continuing through October 21, 2003, in Fairfax and Arlington Counties, Virginia, Achnita Supomo knowingly participated in the preparation of a fraudulent Application for Asylum and for Withholding of Removal (form I-589) on behalf of CI-11 and the subsequent presentation of the same to the Department of Homeland Security.

Raymond Marschall

350. I also have probable cause to believe that on or about February 17, 2001, and continuing through on or about August 18, 2001, in the Eastern District of Virginia, Raymond Marschall knowingly conspired to produce Virginia driver's licenses without lawful authority when such production would be in or affect interstate or foreign commerce, in violation of 18 U.S.C. § 1028, subsections (a)(1), (b)(1)(A)(ii), (c)(3)(A), and (f). Specifically, from on or about February 17, 2001, and continuing through on or about August 18, 2001, Raymond Marschall knowingly conspired with other individuals to prepare and submit false Virginia residency certifications to clerks of the Virginia Department of Motor Vehicles at various Virginia DMV offices in Fairfax County, Virginia, in order to cause those same clerks to produce Virginia driver's licenses and identification cards in violation of Virginia law.

Herlina Suherman

351. I also have probable cause to believe that from on or about July 15, 2003, and continuing through October 21, 2003, in the Eastern District of Virginia, Herlina

Suherman knowingly subscribed as true, under penalty of perjury, a material and false statement in an Application for Asylum and for Withholding of Removal (form I-589), an application required by the immigration laws and federal regulations prescribed thereunder, and knowingly presented the same, in violation of 18 U.S.C. §§ 2 and 1546(a). Specifically, from on or about July 15, 2003, and continuing through October 21, 2003, in Fairfax and Arlington Counties, Virginia, Herlina Suherman knowingly participated in the preparation of a fraudulent Application for Asylum and for Withholding of Removal (form I-589) on behalf of CI-11 and the subsequent presentation of the same to the Department of Homeland Security.

Surya Halim

352. I also have probable cause to believe that from on or about May 7, 2003, continuing through on or about October 21, 2003, in the Eastern District of Virginia, Surya Halim knowingly subscribed as true, under penalty of perjury, a material and false statement in an Application for Asylum and for Withholding of Removal (form I-589), an application required by the immigration laws and federal regulations prescribed thereunder, and knowingly presented the same, in violation of 18 U.S.C. §§ 2 and 1546(a). Specifically, from on or about May 7, 2003, continuing through on or about October 21, 2003, in Fairfax and Arlington Counties, Virginia, Surya Halim knowingly participated in the preparation of a fraudulent Application for Asylum and for Withholding of Removal (form I-589) on behalf of CI-5 and the subsequent presentation of the same to the Department of Homeland Security.

Danny Susanto

353. I also have probable cause to believe that from at least December 1, 1999, continuing through at least July 12, 2001, in the Eastern District of Virginia, Danny Susanto knowingly conspired with Hans Gouw and others to commit an offense against the United States and that Danny Susanto and his co-conspirators did an act to effect the object of the conspiracy, in violation of 18 U.S.C. §§ 371 and 1546(a). Specifically, from at least December 1, 1999, continuing through at least July 12, 2001, in Fairfax and Arlington Counties, Virginia, Danny Susanto, Hans Gouw, and other CIAS agents and clients knowingly conspired to commit asylum fraud, and did in fact prepare and present fraudulent asylum applications to the then Immigration and Naturalization Service (now Department of Homeland Security) containing false accounts of persecution in furtherance of the same conspiracy.

Henry Lee

354. I also have probable cause to believe that from at least December 1, 1999, continuing through at least July 12, 2001, in the Eastern District of Virginia, Henry Lee knowingly conspired with Hans Gouw and others to commit an offense against the United States and that Henry Lee and his co-conspirators did an act to effect the object of the conspiracy, in violation of 18 U.S.C. §§ 371 and 1546(a). Specifically, from at least December 1, 1999, continuing through at least July 12, 2001, in Fairfax and Arlington Counties, Virginia, Henry Lee, Hans Gouw, and other CIAS agents and clients knowingly conspired to commit asylum fraud, and did in fact prepare and present fraudulent asylum applications to the then Immigration and Naturalization Service (now

Department of Homeland Security) containing false accounts of persecution in furtherance of the same conspiracy.

Albert Warong

355. I also have probable cause to believe that from on or about January 10, 2000, and continuing through on or about September 31, 2001, in the Eastern District of Virginia, Albert Warong knowingly conspired to produce Virginia driver's licenses and identification cards without lawful authority when such production would be in or affect interstate or foreign commerce, in violation of 18 U.S.C. § 1028, subsections (a)(1), (b)(1)(A)(ii), (c)(3)(A), and (f). Specifically, from on or about January 10, 2000, and continuing through on or about September 15, 2001, Albert Warong knowingly conspired with other individuals to prepare and submit false Virginia residency certifications to clerks of the Virginia Department of Motor Vehicles at various Virginia DMV offices in Fairfax County, Virginia, in order to cause those same clerks to produce Virginia driver's licenses and identification cards in violation of Virginia law.

Sari Tanudjaya

356. I also have probable cause to believe that from on or about July 21, 2000, and continuing through on or about September 11, 2001, in the Eastern District of Virginia, Sari Tanudjaya knowingly conspired to produce Virginia driver's licenses and identification cards without lawful authority when such production would be in or affect interstate or foreign commerce, in violation of 18 U.S.C. § 1028, subsections (a)(1), (b)(1)(A)(ii), (c)(3)(A), and (f). Specifically, from on or about July 21, 2000, and continuing through on or about September 11, 2001, Sari Tanudjaya knowingly conspired

with other individuals to prepare and submit false Virginia residency certifications to clerks of the Virginia Department of Motor Vehicles at various Virginia DMV offices Fairfax County, Virginia, in order to cause those same clerks to produce Virginia driver's licenses and identification cards in violation of Virginia law.

Johannis Ticoalu

357. I also have probable cause to believe that from on or about March 10, 2000, and continuing through on or about July 24, 2001, in the Eastern District of Virginia, Johannis Ticoalu knowingly conspired to produce Virginia driver's licenses and identification cards without lawful authority when such production would be in or affect interstate or foreign commerce, in violation of 18 U.S.C. § 1028, subsections (a)(1), (b)(1)(A)(ii), (c)(3)(A), and (f). Specifically, from on or about March 10, 2000, and continuing through on or about July 24, 2001, Johannis Ticoalu knowingly conspired with other individuals to prepare and submit false Virginia residency certifications to clerks of the Virginia Department of Motor Vehicles at various Virginia DMV offices in Fairfax County, Virginia, in order to cause those same clerks to produce Virginia driver's licenses and identification cards in violation of Virginia law.

Megawaty Gandasaputra

358. I also have probable cause to believe that from on or about May 7, 2003, and continuing through August 13, 2003, in the Eastern District of Virginia, Megawaty Gandasaputra knowingly subscribed as true, under penalty of perjury, a material and false statement in an Application for Asylum and for Withholding of Removal (form I-589), an application required by the immigration laws and federal regulations prescribed

thereunder, and knowingly presented the same, in violation of 18 U.S.C. §§ 2 and 1546(a). Specifically, from on or about May 7, 2003, and continuing on or about through August 13, 2003, in Fairfax and Arlington Counties, Virginia, Megawaty Gandasaputra knowingly participated in the preparation of a fraudulent Application for Asylum and for Withholding of Removal (form I-589) on behalf of CI-6 and CI-7 and the subsequent presentation of the same to the Department of Homeland Security.

Michael Wright

359. I also have probable cause to believe that from on or about April 18, 2002, through on or about March 20, 2003, in the Eastern District of Virginia, Michael Wright knowingly conspired with others to commit an offense against the United States and that Michael Wright and his co-conspirators did an act to effect the object of the conspiracy, in violation of 18 U.S.C. §§ 371 and 1546(a). Specifically, in Fairfax and Richmond, Virginia, Michael Wright and other AAPS agents and clients knowingly conspired to commit labor certification fraud, in violation of 18 U.S.C. § 1546(a), and did in fact prepare and present labor certification applications containing materially false information to the Department of Labor through the Virginia Employment Commission in furtherance of the same conspiracy.

Irawan Muljadi

360. I also have probable cause to believe that from on or about February 28, 2001, and continuing through on or about July 21, 2001, in the Eastern District of Virginia, Irawan Muljadi knowingly conspired to produce Virginia driver's licenses and identification cards without lawful authority when such production would be in or affect

interstate or foreign commerce, in violation of 18 U.S.C. § 1028, subsections (a)(1), (b)(1)(A)(ii), (c)(3)(A), and (f). Specifically, from on or about February 28, 2001, and continuing through on or about July 21, 2001, Irawan Muljadi knowingly conspired with other individuals to prepare and submit false Virginia residency certifications to clerks of the Virginia Department of Motor Vehicles at various Virginia DMV offices in Fairfax and Arlington Counties, Virginia, in order to cause those same clerks to produce Virginia driver's licenses and identification cards in violation of Virginia law.

Nany Kumala

361. I also have probable cause to believe that on or about July 13, 2000, in the Eastern District of Virginia, Nany Kumala aided and abetted the production of a Virginia identification card without lawful authority when such production was in and affected interstate or foreign commerce, in violation of 18 U.S.C. § 2 and § 1028, subsections (a)(1), (b)(1)(A)(ii), and (c)(3)(A). Specifically, on or about July 13, 2000, in Fairfax County, Virginia, Nany Kumala aided CW-2 to obtain a Virginia identification card by fraud from the Fair Oaks DMV office through the preparation and submission of a fraudulent residency certification or DMV form DL51.

Silvy Karageorge

362. I also have probable cause to believe that from on or about May 13, 2003, and continuing through on or about November 3, 2004, in the Eastern District of Virginia, Silvy Karageorge knowingly subscribed as true, under penalty of perjury, a material and false statement in an Application for Asylum and for Withholding of Removal (form I-589), an application required by the immigration laws and federal

regulations prescribed thereunder, and knowingly presented the same, in violation of 18 U.S.C. §§ 2 and 1546(a). Specifically, May 13, 2003, and continuing through on or about November 3, 2004, in Fairfax and Arlington Counties, Virginia, Silvy Karageorge knowingly participated in the preparation of a fraudulent Application for Asylum and for Withholding of Removal (form I-589) on behalf of CI-11 and the subsequent presentation of the same to the Department of Homeland Security.

Joandi Gani

363. I also have probable cause to believe that on or about April 25, 2003, in the Eastern District of Virginia, Joandi Gani knowingly subscribed as true, under penalty of perjury, a material and false statement in an Application for Alien Employment Certification (form ETA 750), an application required by the immigration laws and federal regulations prescribed thereunder, and knowingly presented the same, in violation of 18 U.S.C. §§ 2 and 1546(a). Specifically, on or about April 25, 2003, in Fairfax County and Richmond, Virginia, Joandi Gani knowingly participated in the preparation of a fraudulent Application for Alien Employment Certification (form ETA 750) and the subsequent presentation of the same to the Virginia Employment Commission and the United States Department of Labor.

XI. INTENTION TO SEEK FORFEITURE

364. Pursuant to 18 U.S.C. § 982, the Court may direct persons convicted of a violation of 18 U.S.C. § 1028, or a conspiracy to commit the same, to forfeit to the United States any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violation. Similarly, the Court may direct persons convicted of a violation of 18 U.S.C. § 1546, or a conspiracy to commit the

same, to forfeit to the United States any property, real or personal, (1) that constitutes, or is derived from, or is traceable to the proceeds obtained directly or indirectly from the commission of the offense, or (2) that is used to facilitate, or is intended to facilitate, the commission of the offense. Therefore, I inform the Court that the United States Attorney Office has indicated to me that it intends to seek forfeiture against the targets in this case to the extent the Court authorizes their arrest and they are subsequently convicted of a violation of 18 U.S.C. §§ 1028 and 1546 (or a conspiracy to commit the same) or any other offense outlined in this affidavit for which forfeiture is authorized.

365. The forfeiture contemplated by the government includes forfeiture of the following properties that represent (1) property derived from the illegal proceeds of a violation of 18 U.S.C. §§ 1028 and 1546 (or a conspiracy to commit the same), (2) property used to facilitate the commission of a violation of 18 U.S.C. § 1546 (or a conspiracy to commit the same), or (3) substitute assets for forfeitable property that has been concealed, transferred to a third party, or commingled with legitimate property:

- a) 6155 Pohick Station Drive, Fairfax Station, Virginia (owner: Hans Gouw);
- b) 6003 Captain Marr Court, Fairfax Station, Virginia (Michael Wright);
- c) 7800 Delano Court, Manassas, Virginia (Silvy Karageorge);
- d) 6308 Torrence Street, Burke, Virginia (Nany Kumala);
- e) 5506 Great Tree Court, Fairfax, Virginia (Hans Gouw);
- f) 13105 Canova Drive, Manassas, Virginia (Jenny Gandasaputra); and
- g) 10807 Oak Wilds Court, Burke, Virginia (Megawaty Gandasaputra).

Signature and Acknowledgment

Special Agent Dean McDonald
Bureau of Immigration and Customs Enforcement
United States Department of Homeland Security

Sworn and subscribed to before me on November 19, 2004, at Alexandria, Virginia.

The Honorable Barry R. Poretz
United States Magistrate Judge

Attachment A1

Description of 6155 Pohick Station Drive, Fairfax Station, Virginia

The property to be searched at 6155 Pohick Station Drive, Fairfax Station, Virginia is a two-story, red brick house with pale yellow trim, gray shutters, and a cedar-shingle roof. There is a two-car garage attached to the right end of the house. There are lights on either side of the garage doors. The front door to the house is covered by a white storm door with full-length glass. There are lights on both sides of the front door. The door is within a small porch supported by two square, white pillars. On the right pillar are large brass numbers that read "6155." There is a fountain in the front yard.

Attachment A2

Description of 6551 Loisdale Court, Suite 115, Springfield, Virginia

The property to be searched at 6551 Loisdale Court, Suite 115, Springfield, Virginia, is a nine-story brick business building. The main entrance to the building is on the lower level in the center of the building. This entrance is covered by a white-colored walkway with black or brown letters that read “6551 SPRING MALL BUILDING.” Suite 115 is on the ground level to the right of the main entrance. Suite 115 can be entered from the street without entering the main building. The entrance to suite 115 is a dark brown or black, aluminum and steel door with full-length glass. There are white letters on the door glass that read “AAPS Suite 115.” Additionally, there are white letters above the door in italic font that read “SUITE 115.”

Attachment A3

Description of 6003 Captain Marr Court, Fairfax Station, Virginia

The property to be searched at 6003 Captain Marr Court, Fairfax Station, Virginia, is a two-story house with white siding and dark gray trim. There is a two-car garage attached to the left end of the house. There are lights on either side of the garage door. The front door to the house is reddish in color and covered by a white storm door with full-length glass. There are dark brass numbers above the front door that read “6003.” There are lights on either side of the entrance.

Attachment A4

Description of 7800 Delano Court, Manassas, Virginia

The property to be searched at 7800 Delano Court, Manassas, Virginia, is a split-level, single-family house with a combination of red brick and tan siding with dark brown shutters. There is a two-story, two-car garage attached to the right side of the house, covered with tan siding and brown shutters. There are exterior lights on either side of the garage. The main entrance is a white door with full length glass panels on either side. There is a recessed light in the ceiling above the front door. There are three steps leading up to the front door from the yard. The only house numbers are located on a mailbox at the end of the driveway that read “7800.”

Attachment A5

Description of 6308 Torrence Street, Burke, Virginia

The property to be searched at 6308 Torrence Street, Burke, Virginia, is a two-story house with a brick facade, and light beige siding. Five columns across the front of the house support an upper deck and roof. There is a white railing covering the entire length of the upper deck and partially covering the length of the lower porch. There is a door on each level in the same horizontal location on the house. There is a two-car garage attached to the right end of the house with a white garage door. There is a motion-sensing light in the center just above the garage door. There are dark colored numbers on the left side of the garage door that read “6308.” The door to the house is covered by a white storm door with glass on the top half. At the end of the driveway is a white mailbox surrounded by a small flower garden.

Attachment A6

Description of 10079 Chestnut Wood Lane, Burke, Virginia

The property to be searched at 10079 Chestnut Wood Lane, Burke, Virginia, is a red brick townhouse with no shutters. The main entrance is a green door with a brass kick plate covered by a green storm door with full-length glass. The entrance is six steps up from the street and is surrounded by a small porch with black railings on either side. There is a light on the left side of the door. There are black numbers on a white plate set on an angle to the left of the door that read "10079."

Attachment A7

Description of 5506 Great Tree Court, Fairfax, Virginia

The property to be searched at 5506 Great Tree Court, Fairfax, Virginia, is a two-story house with light brown siding and cream color trim. There is a single-car garage attached to the right end of the house. The garage door is white. There is a light on the right side of the garage door. The main door to the house is covered by a white storm door with twelve glass panes. Brass numbers that read “5506” are individually attached (vertically) to the door frame to the right of the front door. There is a light on the right side of the door. Additionally, there is a white, arched trellis with a small flower garden in the front yard.

Attachment B1

List of Items to Be Seized from 6155 Pohick Station Drive, Fairfax Station, Virginia

The list of items to be searched for and seized is as follows:

1. Applications for Asylum and for Withholding of Removal (form I-589), and all records and documents pertaining to the preparation and submission of the same.
2. Applications for Alien Employment Certification (form ETA 750), and all records and documents pertaining to the preparation and submission of the same.
3. Records, documents, and applications pertaining to the issuance of Virginia Department of Motor Vehicles driver's licenses, learner's permits, or identification cards.
4. Passports, visas, birth certificates, death certificates, medical certificates, Indonesian police records, green cards, entry documents, travel documents, and any records or documents pertaining to the same.
5. Records and documents pertaining to travel between the United States and Indonesia.
6. Records and documents concerning the business practices of the Chinese Indonesian American Society, including records concerning the society's purpose, operation, ownership, management, employment practices, payroll, structure, and clientele.
7. Documents and records concerning the finances, income, assets, and expenditures of the Chinese Indonesian American Society, Hans Gouw, and Isnayanti Gouw, including bank records, loan records, property records, tax records, social security records, credit card records, ledgers, checks, check registers, statements, credit cards, lines of credit, deposit records, faxes, memoranda, and correspondence.

8. Currency and other monetary instruments.
9. Documents and records concerning the identity and professional activities of Hans Gouw and Isnayanti Gouw, including any records pertaining to the provision of services to immigrants.
10. Documents, records, and objects relating to the Department of Labor, the Immigration and Naturalization Service, the Department of Homeland Security, the Department of State, the Social Security Administration, the Virginia Department of Motor Vehicles, and the Virginia Employment Commission concerning the provision of services to immigrants.
11. Documents, records, and objects concerning Jenny Gandasaputra, Herman Tanudjaja, Johnson Aliffin, Ratna Hartanto, Brigitta Parera, Willy Irsan, Achnita Supomo, Raymond Marschall, Herlina Suherman, Hanny Kembuan, Rosita Setyawati, Lestari Nugroho, Surya Halim, Danny Susanto, Henry Lee, Albert Warong, Sari Tanudjaya, Johannis Ticoalu, Megawaty Gandasaputra, Michael Wright, Joandi Gani, Irawan Muljadi, Nany Kumala, and Silvy Karageorge.
12. Aliens unlawfully in the United States.
13. Any documents, records, and objects outlined in paragraphs one through twelve that are stored electronically on business or personal computers or computer media, including but not limited to telefax machines, hard disk drives, tape storage, floppy diskettes, and removable hard diskettes, laser disks, zip drives including the hardware and software necessary to access such information.

Attachment B2

List of Items to Be Seized from 6551 Loisdale Court, Suite 115, Springfield, Virginia

The list of items to be searched for and seized is as follows:

1. Applications for Asylum and for Withholding of Removal (form I-589), and all records and documents pertaining to the preparation and submission of the same.
2. Applications for Alien Employment Certification (form ETA 750), and all records and documents pertaining to the preparation and submission of the same.
3. Records, documents, and applications pertaining to the issuance of Virginia Department of Motor Vehicles driver's licenses, learner's permits, or identification cards.
4. Passports, visas, birth certificates, death certificates, medical certificates, Indonesian police records, green cards, entry documents, travel documents, and any records or documents pertaining to the same.
5. Records and documents pertaining to travel between the United States and Indonesia.
6. Records and documents concerning the business practices of Asian American Placement Services, including records concerning the business's purpose, operation, ownership, management, employment practices, payroll, structure, and clientele.
7. Documents and records concerning the finances, income, assets, and expenditures of Asian American Placement Services, Megawaty Gandasaputra, and Michael Wright, including bank records, loan records, property records, tax records, social security records, credit card records, ledgers, checks, check registers, statements, credit cards, lines of credit, deposit records, faxes, memoranda, and correspondence.

8. Currency and other monetary instruments.
9. Documents and records concerning the identity and professional activities of Megawaty Gandasaputra and Michael Wright, including any records pertaining to the provision of services to immigrants.
10. Documents, records, and objects relating to the Department of Labor, the Immigration and Naturalization Service, the Department of Homeland Security, the Department of State, the Social Security Administration, the Virginia Department of Motor Vehicles, and the Virginia Employment Commission concerning the provision of services to immigrants.
11. Documents, records, and objects concerning Hans Gouw, Isnayanti Gouw, Jenny Gandasaputra, Herman Tanudjaja, Johnson Aliffin, Ratna Hartanto, Brigitta Parera, Willy Irsan, Achnita Supomo, Raymond Marschall, Herlina Suherman, Hanny Kembuan, Rosita Setyawati, Lestari Nugroho, Surya Halim, Danny Susanto, Henry Lee, Albert Warong, Sari Tanudjaya, Johannis Ticoalu, Joandi Gani, Irawan Muljadi, Nany Kumala, and Silvy Karageorge.
12. Aliens unlawfully in the United States.
13. Any documents, records, and objects outlined in paragraphs one through twelve that are stored electronically on business or personal computers or computer media, including but not limited to telefax machines, hard disk drives, tape storage, floppy diskettes, and removable hard diskettes, laser disks, zip drives including the hardware and software necessary to access such information.

Attachment B3

List of Items to Be Seized from 6003 Captain Marr Court, Fairfax Station, Virginia

The list of items to be searched for and seized is as follows:

1. Applications for Asylum and for Withholding of Removal (form I-589), and all records and documents pertaining to the preparation and submission of the same.
2. Applications for Alien Employment Certification (form ETA 750), and all records and documents pertaining to the preparation and submission of the same.
3. Records, documents, and applications pertaining to the issuance of Virginia Department of Motor Vehicles driver's licenses, learner's permits, or identification cards.
4. Passports, visas, birth certificates, death certificates, medical certificates, Indonesian police records, green cards, entry documents, travel documents, and any records or documents pertaining to the same.
5. Records and documents pertaining to travel between the United States and Indonesia.
6. Records and documents concerning the business practices of Asian American Placement Services, including records concerning the business's purpose, operation, ownership, management, employment practices, payroll, structure, and clientele.
7. Documents and records concerning the finances, income, assets, and expenditures of Asian American Placement Services, Megawaty Gandasaputra, and Michael Wright, including bank records, loan records, property records, tax records, social security records, credit card records, ledgers, checks, check registers, statements, credit cards, lines of credit, deposit records, faxes, memoranda, and correspondence.

8. Currency and other monetary instruments.
9. Documents and records concerning the identity and professional activities of Megawaty Gandasaputra and Michael Wright, including any records pertaining to the provision of services to immigrants.
10. Documents, records, and objects relating to the Department of Labor, the Immigration and Naturalization Service, the Department of Homeland Security, the Department of State, the Social Security Administration, the Virginia Department of Motor Vehicles, and the Virginia Employment Commission concerning the provision of services to immigrants.
11. Documents, records, and objects concerning Hans Gouw, Isnayanti Gouw, Jenny Gandasaputra, Herman Tanudjaja, Johnson Aliffin, Ratna Hartanto, Brigitta Parera, Willy Irsan, Achnita Supomo, Raymond Marschall, Herlina Suherman, Hanny Kembuan, Rosita Setyawati, Lestari Nugroho, Surya Halim, Danny Susanto, Henry Lee, Albert Warong, Sari Tanudjaya, Johannis Ticoalu, Joandi Gani, Irawan Muljadi, Nany Kumala, and Silvy Karageorge.
12. Aliens unlawfully in the United States.
13. Any documents, records, and objects outlined in paragraphs one through twelve that are stored electronically on business or personal computers or computer media, including but not limited to telefax machines, hard disk drives, tape storage, floppy diskettes, and removable hard diskettes, laser disks, zip drives including the hardware and software necessary to access such information.

Attachment B4

List of Items to Be Seized from 7800 Delano Court, Manassas, Virginia

The list of items to be searched for and seized is as follows:

1. Applications for Asylum and for Withholding of Removal (form I-589), and all records and documents pertaining to the preparation and submission of the same.
2. Records, documents, and applications pertaining to the issuance of Virginia Department of Motor Vehicles driver's licenses, learner's permits, or identification cards.
3. Passports, visas, birth certificates, death certificates, medical certificates, Indonesian police records, green cards, entry documents, travel documents, and any records or documents pertaining to the same.
4. Records and documents pertaining to travel between the United States and Indonesia.
5. Records and documents concerning the business practices of the Chinese Indonesian Pribumi Community Service, including records concerning the business's purpose, operation, ownership, management, employment practices, payroll, structure, and clientele.
6. Documents and records concerning the finances, income, assets, and expenditures of the Chinese Indonesian Pribumi Community Service and Silvy Karageorge, including bank records, loan records, property records, tax records, social security records, credit card records, ledgers, checks, check registers, statements, credit cards, lines of credit, deposit records, faxes, memoranda, and correspondence.
7. Currency and other monetary instruments.

8. Documents and records concerning the identity and professional activities of Silvy Karageorge, including any records pertaining to the provision of services to immigrants.

9. Documents, records, and objects relating to the Department of Labor, the Immigration and Naturalization Service, the Department of Homeland Security, the Department of State, the Social Security Administration, the Virginia Department of Motor Vehicles, and the Virginia Employment Commission concerning the provision of services to immigrants.

10. Documents, records, and objects concerning Hans Gouw, Isnayanti Gouw, Jenny Gandasaputra, Herman Tanudjaja, Johnson Aliffin, Ratna Hartanto, Brigitta Parera, Willy Irsan, Achnita Supomo, Raymond Marschall, Herlina Suherman, Hanny Kembuan, Rosita Setyawati, Lestari Nugroho, Surya Halim, Danny Susanto, Henry Lee, Albert Warong, Sari Tanudjaya, Johannis Ticoalu, Megawaty Gandasaputra, Michael Wright, Joandi Gani, Irawan Muljadi, and Nany Kumala.

11. Aliens unlawfully in the United States.

12. Any documents, records, and objects outlined in paragraphs one through eleven that are stored electronically on business or personal computers or computer media, including but not limited to telefax machines, hard disk drives, tape storage, floppy diskettes, and removable hard diskettes, laser disks, zip drives including the hardware and software necessary to access such information.

Attachment B5

List of Items to Be Seized from 6308 Torrence Street, Burke, Virginia

The list of items to be searched for and seized is as follows:

1. Applications for Asylum and for Withholding of Removal (form I-589), and all records and documents pertaining to the preparation and submission of the same.
2. Applications for Alien Employment Certification (form ETA 750), and all records and documents pertaining to the preparation and submission of the same.
3. Records, documents, and applications pertaining to the issuance of Virginia Department of Motor Vehicles driver's licenses, learner's permits, or identification cards.
4. Passports, visas, birth certificates, death certificates, medical certificates, Indonesian police records, green cards, entry documents, travel documents, and any records or documents pertaining to the same.
5. Records and documents pertaining to travel between the United States and Indonesia.
6. Records and documents concerning the business practices of Kumala Nusantara, including records concerning the business's purpose, operation, ownership, management, employment practices, payroll, structure, and clientele.
7. Documents and records concerning the finances, income, assets, and expenditures of Kumala Nusantara and Nany Kumala, including bank records, loan records, property records, tax records, social security records, credit card records, ledgers, checks, check registers, statements, credit cards, lines of credit, deposit records, faxes, memoranda, and correspondence.

8. Currency and other monetary instruments.
9. Documents and records concerning the identity and professional activities of Nany Kumala, including any records pertaining to the provision of services to immigrants.
10. Documents, records, and objects relating to the Department of Labor, the Immigration and Naturalization Service, the Department of Homeland Security, the Department of State, the Social Security Administration, the Virginia Department of Motor Vehicles, and the Virginia Employment Commission concerning the provision of services to immigrants.
11. Documents, records, and objects concerning Hans Gouw, Isnayanti Gouw, Jenny Gandasaputra, Herman Tanudjaja, Johnson Aliffin, Ratna Hartanto, Brigitta Parera, Willy Irsan, Achnita Supomo, Raymond Marschall, Herlina Suherman, Hanny Kembuan, Rosita Setyawati, Lestari Nugroho, Surya Halim, Danny Susanto, Henry Lee, Albert Warong, Sari Tanudjaya, Johannis Ticoalu, Megawaty Gandasaputra, Michael Wright, Joandi Gani, Irawan Muljadi, and Silvy Karageorge.
12. Aliens unlawfully in the United States.
13. Any documents, records, and objects outlined in paragraphs one through twelve that are stored electronically on business or personal computers or computer media, including but not limited to telefax machines, hard disk drives, tape storage, floppy diskettes, and removable hard diskettes, laser disks, zip drives including the hardware and software necessary to access such information.

Attachment B6

List of Items to Be Seized from 10079 Chestnut Wood Lane, Burke, Virginia

The list of items to be searched for and seized is as follows:

- 1) Evidence the property serves as the residence of more than one individual or family.
- 2) Evidence that more than one individual or family receives mail at the residence.
- 3) Aliens unlawfully in the United States.

Attachment B7

List of Items to Be Seized from 5506 Great Tree Court, Fairfax, Virginia

The list of items to be searched for and seized is as follows:

1. Applications for Asylum and for Withholding of Removal (form I-589), and all records and documents pertaining to the preparation and submission of the same.
2. Applications for Alien Employment Certification (form ETA 750), and all records and documents pertaining to the preparation and submission of the same.
3. Records, documents, and applications pertaining to the issuance of Virginia Department of Motor Vehicles driver's licenses, learner's permits, or identification cards.
4. Passports, visas, birth certificates, death certificates, medical certificates, Indonesian police records, green cards, entry documents, travel documents, and any records or documents pertaining to the same.
5. Records and documents pertaining to travel between the United States and Indonesia.
6. Records and documents concerning the business practices of Petra International, including records concerning the business's purpose, operation, ownership, management, employment practices, payroll, structure, and clientele.
7. Documents and records concerning the finances, income, assets, and expenditures of Petra International, Jenny Gandasaputra, Herman Tanudjaja, and Joandi Gani, including bank records, loan records, property records, tax records, social security records, credit card records, ledgers, checks, check registers, statements, credit cards, lines of credit, deposit records, faxes, memoranda, and correspondence.
8. Currency and other monetary instruments.

9. Documents and records concerning the identity and professional activities of Jenny Gandasaputra, Herman Tanudjaja, and Joandi Gani, including any records pertaining to the provision of services to immigrants.

10. Documents, records, and objects relating to the Department of Labor, the Immigration and Naturalization Service, the Department of Homeland Security, the Department of State, the Social Security Administration, the Virginia Department of Motor Vehicles, and the Virginia Employment Commission concerning the provision of services to immigrants.

11. Documents, records, and objects concerning Hans Gouw, Isnayanti Gouw, Johnson Aliffin, Ratna Hartanto, Brigitta Parera, Willy Irsan, Achnita Supomo, Raymond Marschall, Herlina Suherman, Hanny Kembuan, Rosita Setyawati, Lestari Nugroho, Surya Halim, Danny Susanto, Henry Lee, Albert Warong, Sari Tanudjaya, Johannis Ticoalu, Megawaty Gandasaputra, Michael Wright, Irawan Muljadi, Nany Kumala, and Silvy Karageorge.

12. Aliens unlawfully in the United States.

13. Any documents, records, and objects outlined in paragraphs one through twelve that are stored electronically on business or personal computers or computer media, including but not limited to telefax machines, hard disk drives, tape storage, floppy diskettes, and removable hard diskettes, laser disks, zip drives including the hardware and software necessary to access such information.